

Exhibit 8A

IRVINGTON PUBLIC SCHOOLS' OPPOSITION TO DEFENDANTS' MOTIONS FOR SUMMARY JUDGMENT (IRVINGTON) (SD MSJ NO.4)

Case No.: 4:22-md-03047-YGR

MDL No. 3047

Member Case No.: 4:23-cv-01467-YGR

In Re: Social Media Adolescent Addiction/Personal Injury Products Liability Litigation

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1 UNITED STATES DISTRICT COURT
2 NORTHERN DISTRICT OF CALIFORNIA
3

4 IN RE: SOCIAL MEDIA CASE NO.
5 ADOLESCENT ADDICTION/PERSONAL 4:22-md-03047-YGR
6 INJURY PRODUCTS LIABILITY MDL No. 3047
7 LITIGATION
8

9 THIS DOCUMENT RELATES TO:

10 Irvington Public Schools

11 vs.

12 Meta Platforms Inc., et al.

13 Member Case No.: 4:23-cv-01467-YGR
14

15 Tuesday, May 13, 2025

16 CONFIDENTIAL - ATTORNEYS' EYES ONLY

17 PURSUANT TO PROTECTIVE ORDER

18 30(b)(6) videotaped deposition of SHELLEY
19 PETTIFORD, held at the offices of the Irvington
20 Board of Education, One University Place, Irvington,
21 New Jersey, commencing at 9:30 a.m. Eastern, on the
22 above date, before Robin L. Clark, Professional
23 Reporter and Notary Public in and for the State of
24 New Jersey.
25

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1 APPEARANCES:

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3 & AGNELLO, P.C.

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22 Facebook Operations, LLC; Facebook
23 Payments, Inc.; Facebook Technologies,
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Inc.

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1 ALSO PRESENT:

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14 Payments, Inc.; Facebook Technologies,
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23 For the Defendants, Alphabet,
24 Inc., Google, LLC, and YouTube, LLC

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1	I N D E X	
2	WITNESS	PAGE
3	SHELLEY E. PETTIFORD	
4	BY MR. KARP:	7, 152
5	BY MR. INNES:	139, 160

6	E X H I B I T S	
7	NUMBER	DESCRIPTION MARKED
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11	Exhibit 2	Third Amended Plaintiff Fact Sheet - School Districts 23
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15	Exhibit 4	Email dated 3/6/23 Bates BW__Irvington00032766 71
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Exhibit 9 Protocol for Dr. Karla 117
Rivera/Nadirah Muhammad's
Consultation Bates
BW__Irvington00124731 to
124733

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DEPOSITION SUPPORT INDEX

- - - - -

Direction to Witness Not to Answer

Page Line

29 18

38 6

77 10

Request for Production of Documents

Page Line

NONE

Question Marked

Page Line

NONE

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1 THE VIDEOGRAPHER: We are now
2 on the record. My name is Daniel
3 Ortega and I am the legal
4 videographer for Golkow Litigation
5 Services. Today's date is May 13,
6 2025, and the time is 9:30 a.m.
7 This video deposition is being held
8 at One University Place, Irvington,
9 New Jersey, in the matter of Social
10 Media, CA MDL 3047, Irvington
11 Public Schools versus Meta
12 Platforms, Inc., et al.

13 The deponent today is
14 Shelley Pettiford. All counsel
15 will be noted on the stenographic
16 record. The court reporter today
17 is Robin Clark who will now swear
18 in the witness.

19 - - - - -

20 SHELLEY E. PETTIFORD, having
21 been duly sworn, was examined and
22 testified as follows:

23 - - - - -

24 BY MR. KARP:

25 Q. Ms. Pettiford, good morning.

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1 A. Good morning.

2 Q. Can you please state your
3 full name for the record?

4 A. My full name is Shelley Emily
5 Pettiford.

6 Q. My name is Andrew Karp. I
7 represent Snap in this litigation and we'll
8 be spending a little bit of time together
9 today.

10 A. Okay.

11 Q. Is this your first time being
12 deposed?

13 A. No.

14 Q. Okay. You understand that
15 you're under oath today?

16 A. Yes.

17 Q. Is there any reason you
18 cannot provide truthful and accurate
19 testimony today?

20 A. No.

21 Q. If at any point you don't
22 understand a question I've asked, please
23 let me know and I'll do my best to clarify
24 it.

25 A. Okay.

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1 Q. Otherwise, I'll assume you've
2 understood what I've asked.

3 A. Okay.

4 Q. Throughout today's
5 deposition, I may refer to Irvington Public
6 Schools as IPS. Do you understand that if
7 I use IPS, I mean Irvington Public Schools?

8 A. Yes.

9 Q. I may also say the district,
10 in which case I'm referring to Irvington
11 Public Schools.

12 A. Okay.

13 Q. You understand that your
14 testimony today is on behalf of the
15 Irvington Public School District?

16 A. Yes.

17 Q. What is your work address?

18 A. The location of my office?

19 Q. Yes.

20 A. It's at 1253 Clinton Avenue,
21 Irvington High School, Irvington, New
22 Jersey.

23 Q. And what is your home
24 address?

25 A. [REDACTED]

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1 [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] .

2 Q. In advance of your
3 deposition, we requested a copy of your CV,
4 but have not received that CV from your
5 counsel. Did you bring a copy with you
6 today?

7 A. What is a CV?

8 Q. A résumé.

9 A. No, I wasn't aware that I
10 needed to bring a résumé.

11 Q. That's quite all right. We
12 can sort that out separately.

13 A. Uh-huh.

14 Q. I'm handing you tab two,
15 which we will mark as Exhibit 1.

16 - - - - -

17 (Defendants' Amended
18 Supplemental Notice of Oral and
19 Videotaped Deposition of
20 Plaintiff Irvington Public
21 Schools marked Pettiford Exhibit
22 1 for identification.)

23 - - - - -

24 MR. INNES: This is a copy of
25 the notice you served yesterday,

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1 right?

2 MR. KARP: Yes.

3 THE WITNESS: That's this one?

4 MR. INNES: Yes, same thing.

5 BY MR. KARP:

6 Q. Ms. Pettiford, have you seen
7 this document before?

8 A. Yes, I have.

9 Q. What is your understanding of
10 this document?

11 A. That it is various topics
12 that we may discuss today during our
13 deposition.

14 Q. You understand that you have
15 been designated to speak or to provide
16 testimony on certain topics that are listed
17 in this notice.

18 A. Yes.

19 Q. Okay. Let's look at some of
20 those topics. If we turn to Schedule A,
21 which starts on page 6, you'll see a
22 definitions section.

23 A. Yes.

24 Q. And if you turn the page to
25 page 7 --

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1 A. Yup.

2 Q. -- Section II is the
3 deposition topics.

4 A. Yes.

5 Q. Let's turn to page 13. Do
6 you see the section called, "Student Mental
7 Health and Related Services"?

8 A. I do.

9 Q. Do you understand that you
10 have been designated to testify on topics
11 32 through 34?

12 A. Thirty-two -- yes.

13 Q. You've also been designated
14 to testify on topic 38?

15 A. Yes.

16 Q. You've also been designated
17 to testify on topic 40?

18 A. Yes.

19 Q. You've also been designated
20 to testify on topic 42?

21 A. Yes.

22 Q. You've been designated to
23 testify on topic 44?

24 A. Yes.

25 Q. And you've been designated to

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1 testify on topic 46?

2 A. Yes.

3 Q. Have you been designated to
4 testify on any other topic --

5 A. No.

6 Q. -- at today's deposition?

7 A. No, I haven't.

8 Q. Did you do anything to
9 prepare for today's deposition?

10 A. Yes.

11 Q. What did you do to prepare?

12 A. I met with counsel. I met --
13 I had conversations with Superintendent
14 Dr. Vauss; Mr. Amberg, who is an executive
15 director of technology; Principal Mangan
16 who is a principal at the high school.
17 Principal Zahir, who is a principal of
18 Union Avenue Middle School; Principal
19 Bussacco, who is principal of University
20 Middle; Dean Freeman who is a dean at the
21 high school. And also I met with school
22 counselors, Ms. Brown from the high school;
23 Ms. Cedillo from the high school;
24 Ms. Johnson, who is an HSSC at the high
25 school; Ms. Vasquez who is an HSSC at the

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1 high school; Ms. Lopez who is an HSSC at
2 the University Middle; and Ms. Penn who is
3 an AP at the middle school, University
4 Middle, former school counselor.

5 Q. What was that last name?

6 A. Penn, P-E-N-N.

7 Q. Approximately how many times
8 did you meet with counsel?

9 MR. INNES: Objection to form.

10 BY MR. KARP:

11 Q. I'll reask. Approximately
12 how many times did you meet with counsel to
13 prepare for today's deposition?

14 A. Maybe ten plus.

15 Q. Do you recall when you first
16 met with counsel to prepare for today's
17 deposition?

18 A. No, I don't recall.

19 Q. Could you give me a rough
20 estimate of when you first met with counsel
21 to prepare for today's deposition?

22 A. I need clarity, I have a
23 clarifying question, is that okay?

24 Q. For your counsel or a
25 clarifying question for me?

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1 A. I think it's for you.

2 Q. Sure.

3 A. When I first met Mr. Innes or
4 when we started preparing for today?

5 Q. When was your first meeting
6 in preparation for today's deposition with
7 counsel?

8 A. A few weeks, it's been a few
9 weeks.

10 Q. Okay.

11 A. Probably, probably two, three
12 weeks --

13 Q. Two to three weeks --

14 A. -- or more.

15 Q. -- ago?

16 A. Yeah, maybe a month.

17 Q. And between then and now, you
18 have met with counsel approximately ten
19 times to prepare for today's deposition?

20 A. Yes.

21 Q. On average, how long did
22 those meetings last?

23 A. Three, maybe five hours.

24 Q. Was anyone else present at
25 those meetings?

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1 A. Yes.

2 Q. Were those other individuals
3 lawyers?

4 A. Some of the meetings, yes.

5 Q. Okay. What other lawyer --
6 when you say that you met with counsel,
7 who -- who did you meet with?

8 A. In terms of the team,
9 correct?

10 Q. Can you name the lawyer?

11 A. Zach was once or twice, Dave,
12 and Mike.

13 Q. And by, "Mike," you mean
14 Michael Innes --

15 A. I do.

16 Q. -- who is representing you
17 today?

18 A. Yup.

19 Q. When you had conversations
20 with Dr. Vauss, Mr. Amberg, Mr. Mangan, Dr.
21 Zahir, and Mr. Bussacco, were those in the
22 presence of counsel?

23 A. Yes.

24 Q. Were your conversations with
25 Dean Freeman, Ms. Brown, Ms. Cedillo,

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1 Ms. Johnson, Ms. Vasquez, Ms. Lopez, and
2 Ms. Penn also in the presence of counsel?

3 A. Yes.

4 Q. Are you relying on your
5 conversations with those nonlawyers for
6 your testimony today?

7 A. The conversations are
8 helpful.

9 Q. In what way?

10 A. They're helpful in the fact
11 that I want to be able to give clear,
12 concise answers that accurately reflect the
13 district.

14 Q. What did you discuss with
15 Dr. Vauss in preparation for today's
16 deposition?

17 A. We went over some of the
18 topics in the Complaint to be sure that,
19 again, our answers were clear, concise, and
20 accurate for the district.

21 Q. Did she provide any
22 information that you are relying on today?

23 MR. INNES: Objection to form.

24 MR. KARP: You may answer.

25 THE WITNESS: I'm like what do

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1 I do? Rely on is a funny word,
2 right? All the conversations are
3 helpful to make sure that I give
4 you accurate information.

5 BY MR. KARP:

6 Q. You mentioned Dean Freeman,
7 what is Dean Freeman's role?

8 A. She's a dean at the high
9 school, so climate and culture at the high
10 school. And she's not -- she's no longer a
11 dean, I'm sorry, she's now an assistant --
12 an acting assistant principal. She used to
13 be in the dean capacity, my apologies.

14 Q. No problem. When did she
15 change roles?

16 A. I believe this is her first
17 year, so that would be September.

18 Q. Did you review any documents
19 to prepare for today's deposition?

20 A. Yes, I reviewed this
21 document.

22 Q. Are you gesturing to the
23 notice?

24 A. Yes, I apologize.

25 Q. That's okay. Other than the

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1 deposition notice, did you review documents
2 to prepare for today's deposition?

3 A. Some of my personal documents
4 just to support my answers, just to make
5 sure I was giving you clear and concise
6 answers, yes.

7 Q. I understand. Why was it
8 important to you to review those documents?

9 A. Because I want to be honest
10 in my testimony.

11 Q. Sitting here today, do you
12 recall what those documents are?

13 A. For instance, I looked at --
14 I looked at my awareness dates to make sure
15 I remembered them all, because they are
16 associated with one of the topics.

17 Q. What is an awareness date?

18 A. So members of my team do
19 different awareness dates to support a safe
20 environment and it's relevant to one of
21 your questions -- one of your -- one of
22 your topics.

23 Q. What is the significance of
24 an awareness date?

25 A. The significance is to

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1 promote a healthy school environment. So
2 there are different activities that we are
3 responsible to have throughout the year and
4 I wanted to be sure I remembered those for
5 today.

6 Q. And for those who just aren't
7 as familiar with the definition of an
8 awareness date, what does that date
9 represent?

10 A. Different topics. So, for
11 instance, it's May, so an awareness date in
12 May would be a mental health, because it's
13 mental health month. So each month may
14 have a different awareness date, school
15 violence prevention, suicide prevention.
16 So I just wanted to make sure I remembered
17 those so that we could speak about it
18 today.

19 Q. So these are dates on which
20 awareness is being directed to a certain
21 topic or subject matter?

22 A. Yes.

23 Q. Other than looking at
24 awareness dates and the notice, did you
25 review -- do you recall the documents that

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1 you reviewed to prepare for today?

2 A. That's pretty much it,
3 uh-huh.

4 Q. Did you bring any documents
5 with you to today's deposition?

6 A. Yes.

7 Q. What did you bring with you?

8 A. I brought the -- what is this
9 called?

10 MR. INNES: You can just read
11 it.

12 THE WITNESS: Oh, Plaintiff's
13 amended answers, is that what I
14 should be reading? Plaintiff's
15 Amended Answer to Defendant's
16 Interrogatory 3 to Irvington Public
17 Schools, I brought that.

18 BY MR. KARP:

19 Q. So you brought a set of
20 interrogatory responses?

21 A. Yes, uh-huh.

22 Q. Did you bring anything else
23 with you?

24 A. I think it's two of them.
25 There are actually two. It's a set. So I

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1 have set one, set three, and I also have
2 the Complaint.

3 Q. Did you bring anything else
4 with you today to today's deposition?

5 A. I have some personal notes as
6 well.

7 Q. Did you take notes on the
8 interrogatory responses or the Complaint?

9 A. Yes.

10 Q. You said you also brought
11 personal notes?

12 A. Uh-huh.

13 Q. Did you take notes or
14 annotate the copy of the notice that you
15 brought with you to today's deposition?

16 A. Did I take notes on the
17 notice, yes.

18 MR. KARP: We'll request
19 copies of all of the annotated
20 documents --

21 MR. INNES: Sure.

22 MR. KARP: -- and if it's
23 possible to do that on a break
24 while we're still here, that would
25 be great.

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1 BY MR. KARP:

2 Q. Let's talk about the personal
3 notes that you brought?

4 A. Okay.

5 Q. What is -- what information
6 is contained in your personal notes?

7 A. Just, I guess some starter
8 points so that I can accurately answer your
9 questions on the different items that are
10 my responsibility.

11 Q. Is this information you felt
12 was important that you wanted to have
13 available to you during the deposition?

14 A. Absolutely.

15 Q. I'm handing you tab 13, which
16 we'll mark as Exhibit 2.

17 - - - - -

18 (Third Amended Plaintiff
19 Fact Sheet - School Districts
20 marked Pettiford Exhibit 2 for
21 identification.)

22 - - - - -

23 BY MR. KARP:

24 Q. This is the Third Amended
25 Plaintiff Fact Sheet - School Districts.

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1 Have you seen this document
2 before, Ms. Pettiford?

3 A. I have not.

4 Q. Do you have an understanding
5 of what it is?

6 MR. INNES: Objection to form.

7 THE WITNESS: I do not. This
8 is my first time seeing it. I
9 would need to read through it.

10 BY MR. KARP:

11 Q. If at any point I ask a
12 question and you need an opportunity to
13 review, let me know, but I will not be
14 asking you about every single page of this
15 document.

16 A. Okay.

17 Q. Can you turn to the very last
18 page, which is page 40?

19 A. Okay.

20 Q. Do you see that this is a
21 certification page?

22 A. I do.

23 Q. And this certification was
24 signed by April Vauss?

25 A. I see that.

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1 Q. Who is April Vauss?

2 A. The superintendent of
3 schools.

4 Q. And she signed this
5 certification on April 28, 2025.

6 Do you see that?

7 A. Yes.

8 Q. And as part of this
9 certification, she declared under penalty
10 of perjury that the information provided in
11 this Plaintiff Fact Sheet is complete,
12 true, and correct to the best of her
13 knowledge and information.

14 Do you see that?

15 A. Yes.

16 Q. Let's turn to page 11. Are
17 you there?

18 A. I am.

19 Q. Okay. And page 11 includes
20 question number 16. Do you see that?

21 A. Yes.

22 Q. Okay. Question number 16
23 asks the district to, "Provide the total
24 number of healthcare workers (for example,
25 social workers, nurses, psychologists,

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1 psychiatrists, counselors) employed by the
2 district whose primary responsibilities
3 include addressing student mental health
4 issues from 2017 to 2018 to present or to
5 the year for which data is most currently
6 available and their positions (specified as
7 FTE, if available), as well as the total
8 number of volunteers in these positions, if
9 any. "

10 Do you see that?

11 A. Yes.

12 Q. And did I read that
13 correctly?

14 A. You did.

15 Q. Okay. And below that prompt
16 is a table. Do you see that?

17 A. Yes.

18 Q. And in the column for number
19 of employees, N/A is written for all of the
20 years listed?

21 A. Yes.

22 Q. Do you see that?

23 A. Yes.

24 Q. Okay. So from 2017 -- excuse
25 me, from the 2017-2018 school year through

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1 the 2023-2024 school year, the district
2 indicated N/A.

3 Do you see that?

4 A. Yes.

5 Q. It's the same response for
6 the number of volunteers?

7 A. Yes.

8 Q. Do you see that? For those
9 same school years?

10 A. Yes.

11 Q. Is it the district's position
12 that no IPS employees have primary
13 responsibility for addressing student
14 mental health issues?

15 MR. INNES: Objection to form.
16 Outside the scope. You can answer.

17 THE WITNESS: Can you repeat
18 the question?

19 BY MR. KARP:

20 Q. Is it the district's position
21 that IPS does not employ anyone whose
22 primary responsibility it is to provide
23 mental health services to students?

24 MR. INNES: Objection.
25 Outside the scope.

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1 THE WITNESS: I'm confused by
2 the question.

3 BY MR. KARP:

4 Q. The table that we just looked
5 at says "N/A --"

6 A. Yeah.

7 Q. -- for each of these years
8 and doesn't provide a specific number.

9 Do you see that?

10 A. I do.

11 Q. Okay. Is it the district's
12 position that there are no employees of the
13 district whose primary responsibility it is
14 to provide mental health services to
15 students?

16 MR. INNES: Objection.

17 Objection. Outside the scope. You
18 can answer.

19 THE WITNESS: According to
20 this chart, it would appear so, as
21 such.

22 BY MR. KARP:

23 Q. And as we looked, the
24 district certified this answer, correct?

25 A. Yes.

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1 Q. Do you have a different
2 understanding?

3 A. Yes.

4 Q. Do you believe that the
5 information contained in this table is not
6 true or accurate?

7 MR. INNES: Objection to form.
8 It's early on, but you've done it
9 pretty early. So when you say
10 "you," are you referring to IPS or
11 are you referring to Ms. Pettiford
12 in her professional capacity?

13 BY MR. KARP:

14 Q. Sure. Ms. Pettiford, in your
15 individual or personal capacity, do you
16 believe that the information contained in
17 this table is not true or inaccurate?

18 MR. INNES: Objection. You
19 don't have to answer that question.

20 MR. KARP: You're instructing
21 her not to answer that?

22 MR. INNES: I am.

23 BY MR. KARP:

24 Q. Are you going to follow your
25 counsel's instruction?

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1 A. Absolutely.

2 Q. As the district, is it your
3 position that the information contained in
4 this table is not true or accurate?

5 A. I would go with the will of
6 the superintendent of schools and her
7 certification of this document.

8 Q. What is the district's
9 understanding of healthcare workers
10 employed by the district whose primary
11 responsibilities include addressing student
12 mental health issues?

13 MR. INNES: Objection to form.
14 Can you direct me to what topic
15 we're under? And, if you can, that
16 might obviate my need for scope
17 objections. But as it stands, I
18 don't see a topic that's directly
19 related to this, but if you can
20 tell me what it is --

21 MR. KARP: Topics 32 through
22 34 relate to how many students have
23 sought services and understanding
24 who is providing those services is
25 certainly within the scope of those

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1 topics.

2 MR. INNES: Okay. These
3 questions have nothing to do with
4 that though, Andrew.

5 MR. KARP: Your scope
6 objection is noted. I believe that
7 these are within the -- these
8 questions are within the scope.

9 MR. INNES: You're definitely
10 not getting out of here before
11 lunch.

12 BY MR. KARP:

13 Q. Do you need me to reask my
14 question?

15 A. Yes.

16 Q. Is it the -- what is the
17 district's understanding of the phrase,
18 "healthcare workers employed by the
19 district whose primary responsibilities
20 include addressing student mental health
21 issues"?

22 A. Since you have connected it
23 to questions 32 to 34, I'm going to assume
24 that healthcare workers are the vendors
25 that are listed, which would then make this

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1 document extremely accurate.

2 Q. The vendors who are listed,
3 meaning third parties?

4 A. Meaning third parties, yes.
5 If those are considered healthcare workers,
6 then the answer would be N/A, because, yes.

7 Q. The parenthetical here
8 includes social workers, nurses,
9 psychologists, psychiatrists, and
10 counselors.

11 Do you see that?

12 A. I do.

13 Q. Does IPS employ any of those
14 individuals?

15 A. Is it mental health
16 counselors? Mental health counselors, no.
17 Nurses, yes. School psychologists, yes.
18 On the Child Study Team, meaning special ed
19 services. School counselors, yes, and
20 health and service coordinators.

21 Q. Is it the district's position
22 that those individuals do not have the
23 primary responsibility of providing mental
24 health services to students?

25 A. I think primary is relative,

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1 is that a percentage? Is there a
2 percentage attached to primary
3 responsibility?

4 Q. What is the district's
5 understanding of primary as it's being used
6 here?

7 A. That would be a total guess.
8 Is this the district's document?

9 Q. This is a document that the
10 district certified and provided in
11 litigation.

12 MR. INNES: Objection.

13 Misrepresents the certification.

14 THE WITNESS: I don't know is
15 my answer.

16 BY MR. KARP:

17 Q. Is it the district's position
18 that school psychologists do not have among
19 their primary responsibilities, the
20 responsibility of providing mental health
21 services to students?

22 A. I am not responsible for
23 school psychologists throughout the
24 district. I wouldn't know that answer.

25 Q. I'm asking you as the

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1 district, not as Ms. Pettiford.

2 A. I'm responding as the
3 district. As a district employee, I
4 supervise school counselors and health and
5 social service coordinators.

6 Q. Is it the district's position
7 that it is not one of the primary
8 responsibilities of school social workers,
9 HSSCs to provide mental health services to
10 students?

11 MR. INNES: Objection to
12 scope.

13 THE WITNESS: So HSSCs do not
14 provide mental health counseling to
15 students.

16 BY MR. KARP:

17 Q. And my question was a little
18 different. I wasn't asking about mental
19 health counseling, I was asking about
20 addressing student mental health issues.
21 Is it one of the primary responsibilities
22 of an IPS social worker to address student
23 mental health issues?

24 MR. INNES: Objection to form
25 to scope. Do, Andrew, you

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1 represented that we're talking
2 about -- that these questions are
3 within the scope of every notice
4 topic, right? So --

5 MR. KARP: I didn't say that.

6 MR. INNES: You did.

7 MR. KARP: I said topics 32 to
8 34.

9 MR. INNES: Thirty-two to --
10 all right, we can limit it to that.
11 So 32 is the number of students.
12 33 is the identification and
13 conclusions of any analysis. And
14 there's 34.

15 MR. KARP: Uh-huh.

16 MR. INNES: The identification
17 and conclusions of any analysis. I
18 don't see in here any way, shape,
19 or form that the number of health
20 workers or the response to 16 is in
21 any way within the scope of any of
22 those topics.

23 MR. KARP: So this is a topic
24 that Dr. Vauss will be prepared to
25 address on Friday?

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1 MR. INNES: Dr. Vauss will be
2 prepared to testify on the topics
3 she's noticed on.

4 MR. KARP: The questions I'm
5 asking, will Dr. Vauss be prepared
6 to answer them on Friday, because
7 then I can --

8 MR. INNES: What topics are
9 these relevant to there? Do you
10 want -- okay, let's keep talking
11 about that. Direct me to the topic
12 that you want me to prepare
13 Dr. Vauss on for this answer for
14 this question.

15 MR. KARP: We have limited
16 time. Your scope objection is
17 noted --

18 MR. INNES: You've asked me on
19 the record if I'm going to prepare
20 my witness in a fashion that I'm
21 unaware of until just now. So if
22 you want to go on the record and
23 talk about that, let's finish that
24 conversation. What topic is Dr.
25 Vauss -- will these questions

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1 relate to from Dr. Vauss's notice?

2 MR. KARP: We're going to move
3 on. I'm going to ask my questions.
4 We have limited time.

5 MR. INNES: So are we not
6 going to --

7 MR. KARP: We are not going
8 to --

9 MR. INNES: If these
10 questions, if you're conceding that
11 these questions are relevant to
12 topics that are noticed for another
13 day, that's a totally different --

14 MR. KARP: I'm not. I have
15 not made that concession. Okay.
16 We are going to continue our
17 questioning here and your scope
18 objection is noted. Okay. That's
19 all you're permitted, form
20 objections, and I will let you do a
21 scope objection, you know, but
22 that's it. We're done.

23 BY MR. KARP:

24 Q. Ms. Pettiford, do you
25 remember the question that was pending?

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1 A. I do not.

2 Q. Is it the district's position
3 that HSSCs employed by IPS do not have
4 among their primary responsibilities
5 addressing student mental health issues?

6 MR. INNES: Objection to
7 scope. You don't have to answer
8 that question.

9 BY MR. KARP:

10 Q. Are you going to follow your
11 counsel's instruction not to answer?

12 A. Yes.

13 Q. You'd agree with me that
14 guidance counselors and HSSCs at IPS have
15 many responsibilities?

16 A. Yes.

17 Q. They provide many services to
18 students, correct?

19 MR. INNES: Objection to
20 scope.

21 THE WITNESS: Yes.

22 BY MR. KARP:

23 Q. They're involved in student
24 discipline?

25 MR. INNES: Objection to

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1 scope.

2 THE WITNESS: No.

3 BY MR. KARP:

4 Q. They're not. Are they
5 involved in investigating HIB issues?

6 A. Yes.

7 Q. Are they involved in student
8 safety issues?

9 MR. INNES: Objection to
10 scope.

11 THE WITNESS: Safety in what
12 way?

13 BY MR. KARP:

14 Q. In addressing safety
15 incidents that come up involving students.

16 MR. INNES: Objection to
17 scope.

18 THE WITNESS: Can you give me
19 an example?

20 BY MR. KARP:

21 Q. If someone's behavioral
22 problems posed a safety issue, they might
23 get involved in counseling those students
24 and the students implicated in the
25 incident?

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1 MR. INNES: Objection to
2 scope.

3 THE WITNESS: They may.

4 BY MR. KARP:

5 Q. Counselors and HSSCs may be
6 involved in college planning for students?

7 A. School counselors, yes.

8 Q. School counselors might be
9 involved in course selection?

10 A. Yes.

11 Q. They might be involved --
12 counselors might be involved in
13 post-graduation planning?

14 A. Yes.

15 Q. Would counselors or HSSCs be
16 involved in helping students navigate
17 government programs such as financial aid
18 or --

19 A. Yes.

20 Q. -- assistance programs?
21 Would they be involved with
22 social/emotional learning curriculum?

23 A. Yes.

24 Q. Are counselors and social
25 workers involved in addressing substance

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1 abuse issues for students?

2 MR. INNES: Objection.

3 THE WITNESS: Yes and no.

4 BY MR. KARP:

5 Q. Can you explain your answer?

6 A. When you say, "addressing,"
7 it's the addressing word that I'm having
8 difficulty with.

9 Q. Sure. If a student were to
10 have a substance abuse issue and need
11 assistance combating that --

12 A. Uh-huh.

13 Q. -- addiction or whatever it
14 was, would a social worker or counselor be
15 involved?

16 A. They would be involved in
17 referring the student to the necessary
18 third party.

19 MR. INNES: Andrew, I'm sorry,
20 could we go off the record for
21 three minutes? This is just
22 something in another matter that
23 just came up for me.

24 MR. KARP: That's fine. We
25 can go off the record.

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1 THE VIDEOGRAPHER: The time
2 right now is 10:02 a.m. We are off
3 the record.

4 - - - - -

5 (A recess was taken at this time.)

6 - - - - -

7 THE VIDEOGRAPHER: The time
8 right now is 10:17 a.m. We're back
9 on the record.

10 BY MR. KARP:

11 Q. Welcome back, Ms. Pettiford.

12 A. Thank you.

13 Q. I'm handing you tab 14, which
14 we'll mark as Exhibit 3. This is Plaintiff
15 Fact Sheet - School Districts Supplemental.

16 Do you see that?

17 A. Yes, I follow you, yes.

18 Q. Have you seen this document
19 before?

20 A. No.

21 - - - - -

22 (Plaintiff Fact Sheet -
23 School Districts Supplemental
24 marked Pettiford Exhibit 3 for
25 identification.)

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1 - - - - -

2 BY MR. KARP:

3 Q. Let's turn to the very last
4 page of this document. Do you see a
5 certification page?

6 A. Yes.

7 Q. This is also signed by
8 Dr. Vauss?

9 A. Yes.

10 Q. And this is dated May 31,
11 2024?

12 A. Yes.

13 Q. She makes the same
14 declaration under penalty of percentage
15 that the information provided in this
16 Plaintiff Fact Sheet is complete, true, and
17 correct to the best of her knowledge and
18 information?

19 A. Yes.

20 Q. Let's take a look at page 6.

21 A. Page 6, there are no page
22 numbers, what number are you looking at?

23 Q. That is odd. Let's go to
24 question number nine. Are you there?

25 A. I am.

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1 Q. Okay. Question nine asks the
2 district to provide the number of students
3 at IPS who were referred for mental health
4 services if such referrals are tracked.

5 Do you see that?

6 A. I do.

7 Q. And then it gives a break
8 down of the number of students had who were
9 referred for mental health services for
10 each year between the school year 2017-2018
11 and the school year 2023-2024.

12 Do you see that?

13 A. Yes.

14 Q. Any reason to doubt that the
15 numbers that are reflected in this table
16 are accurate and that this information is
17 complete?

18 A. No reason.

19 Q. Does IPS refer students to
20 third-party providers for mental health
21 services?

22 A. Yes.

23 Q. Under what circumstances?

24 A. It could be a number of
25 things. It could be suicide ideation, body

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1 dysmorphia, anxiety, depression, et cetera.

2 Q. Do the issues need to rise to
3 a certain threshold level of seriousness in
4 order for a referral to occur?

5 A. On an individual basis. It
6 can be seriousness. It could be number of
7 occurrences. So it kind of depends. It's
8 on a case-by-case basis, I would say.

9 Q. Who is responsible for
10 determining whether or not a student is
11 referred out for mental health services?

12 A. Typically, it's the health
13 and social service coordinator. Not
14 that it's only the mental health -- the
15 HSSC, but, typically, it is the health and
16 social service coordinator.

17 Q. If not the HSSC, who else
18 could be in charge of determining whether
19 or not to refer a student for mental health
20 services?

21 A. It could be a school
22 counselor. It could be a principal. It
23 could be a nurse.

24 Q. Let's talk about HSSCs for a
25 second. And just for clarity, what does

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1 HSSC stand for?

2 A. Health and social service
3 coordinator.

4 Q. Are HSSCs specific to
5 schools, individual schools within the
6 Irvington Public School District or do they
7 have district-wide responsibilities?

8 A. They have school
9 responsibilities, they are assigned to
10 schools.

11 Q. So an HSSC would be assigned
12 to a specific middle school, for example --

13 A. Uh-huh.

14 Q. -- as opposed to serving as
15 the HSSC for the entire district?

16 A. Yes.

17 Q. And one responsibility of an
18 HSSC would be to make this determination of
19 whether or not to refer students to a third
20 party for mental health services?

21 A. Yes.

22 Q. Okay. When students are
23 referred for mental health services, does
24 the district create a record of that
25 referral?

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1 A. If students are sent out to a
2 crisis for, like, a crisis evaluation, yes,
3 there is a letter that accompanies the
4 student.

5 Q. And when you say, "a letter
6 that accompanies the student," do you mean
7 that it becomes part of that student's
8 file?

9 A. Yes.

10 Q. And are individual schools
11 responsible for maintaining those referral
12 letters?

13 A. Yes.

14 Q. What information is contained
15 in a referral letter?

16 A. For this particular example?

17 Q. Yes.

18 A. Name of student, date, of
19 course, maybe a small write-up of what
20 happened leading to the referral. And then
21 it would be information on where the parent
22 can take the student for support, for help.

23 Q. So a list of third parties
24 who may be able to provide the service?

25 A. Yes, yup.

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1 Q. Is the information contained
2 on these referral forms compiled in any --
3 or aggregated in a single place?

4 A. No.

5 MR. INNES: Objection to form.

6 THE WITNESS: Oh, I apologize,
7 no.

8 BY MR. KARP:

9 Q. Once a student is referred
10 out for services, does the district get
11 notified or updated on whether the student
12 has actually went out to obtain those
13 services?

14 MR. INNES: Objection to form.

15 THE WITNESS: No.

16 BY MR. KARP:

17 Q. So a student who is referred
18 out for anxiety and told that there are a
19 number of providers who can help him or her
20 who doesn't actually follow through on the
21 referral, that's not something the district
22 would learn of?

23 A. So if a student is sent out
24 for crisis in one of those situations, they
25 have to come back with clearance, so maybe

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1 that answer is yes.

2 Q. What do you mean by, "come
3 back with clearance"?

4 A. If I'm a student who is
5 having, let's just say suicide ideation, I
6 speak with my HSSC, she determines I should
7 be sent to crisis for an evaluation. In
8 order to return to school, I need a
9 clearance letter.

10 Q. Understood. Once a student
11 is referred out for mental health services
12 and starts treatment with one of these
13 third-party providers, does the district
14 get updates on how that treatment is going?

15 A. No.

16 Q. Does the district receive any
17 records as to the course of treatment that
18 that student is undergoing?

19 A. No, because that information
20 is confidential.

21 Q. The third-party providers
22 would maintain records relating to the
23 mental health services they are providing
24 to that student?

25 MR. INNES: Objection to form.

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1 Outside the scope. You can answer.

2 THE WITNESS: Yes.

3 BY MR. KARP:

4 Q. Does the district have the
5 ability to request copies of the records
6 that are maintained by these third-party
7 providers in providing mental health
8 services to IPS students?

9 A. No, because that information
10 is confidential.

11 Q. Historically, has the
12 district ever requested records pertaining
13 to mental health services that were
14 provided by a third party to IPS students?

15 MR. INNES: Objection. Asked
16 and answered.

17 MR. KARP: You can answer.

18 THE WITNESS: Not to my
19 knowledge, no.

20 BY MR. KARP:

21 Q. Looking at this table, in the
22 2017-2018 school year, there were 19
23 referrals; is that right?

24 A. According to the document,
25 yes.

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1 Q. Is the district aware of
2 whether any of the 19 referrals related to
3 social media?

4 A. I am not sure.

5 Q. For any of the referrals that
6 are listed in this table, does the district
7 know whether they related to social media?

8 A. I'm not sure. I would need
9 more information.

10 Q. Topic 32 in this notice is,
11 "The number of students who sought and/or
12 received treatment or consultation for
13 mental, social, emotional, or behavioral
14 health concerns each year during the
15 Relevant Time Period."

16 A. Yes.

17 Q. And then lists a number of
18 the third-party providers?

19 A. Uh-huh.

20 Q. Topic 33 relates to, "The
21 identification and conclusions of any
22 analysis of Students' mental, emotional,
23 social, or behavioral health."

24 Do you see that?

25 A. Yes.

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1 Q. And 34 refers to, "The
2 identification and conclusions of any
3 analysis of any change over time (including
4 the alleged causes of such change) in
5 students' mental, emotional, social, or
6 behavioral health."

7 Do you see that?

8 A. Yes.

9 Q. Sitting here today, the
10 district isn't prepared to answer --

11 A. Excuse me, I'm sorry.

12 Q. Sitting here today, the
13 district isn't prepared to answer whether
14 any of the referrals that are listed in the
15 response to question nine relate to social
16 media?

17 A. Can you repeat your question,
18 I'm sorry?

19 Q. Sitting here today, the
20 district is not prepared to answer whether
21 any of the referrals that are listed in the
22 response to question nine relate to social
23 media?

24 A. We would have to pull every
25 student record to get that information.

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1 Q. And when you say, "every
2 student record," do you mean the referral
3 letters or something else?

4 A. I mean, we would need to look
5 at every record of every student in the
6 district to get that information.

7 Q. If I want to know
8 specifically for the individuals who have
9 been referred out for services --

10 A. Yes.

11 Q. -- who are accounted for in
12 this table, whether their referrals related
13 to social media, where would I look?

14 A. The student records.

15 Q. So I would need to pull the
16 student records for these individuals in
17 order to know whether their referrals
18 related to social media?

19 A. That would be my assumption
20 of where the information would be.

21 Q. Does the district maintain or
22 hold onto the clearance letters it receives
23 once a student has received support for the
24 crisis and has returned to school?

25 A. That information should be in

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1 the student file.

2 Q. And would those clearance
3 letters include details regarding whether
4 social media was in any way involved in the
5 mental health challenges that that student
6 was experiencing?

7 MR. INNES: Objection to form.
8 Objection to scope.

9 Ms. Pettiford, I would just
10 caution you not to -- to the
11 extent that you know in your
12 personal capacity any details
13 about the individual students, I
14 would instruct you not to divulge
15 that information, but if you can
16 otherwise answer the question,
17 you may do so.

18 THE WITNESS: Okay. Can you
19 repeat your question?

20 BY MR. KARP:

21 Q. Sure. To the extent that a
22 student has received support for suicidal
23 ideation and has returned to school with a
24 clearance letter, would that letter include
25 information regarding whether social media

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1 was a part of the student's challenges?

2 A. It would probably not include
3 a detailed description.

4 Q. Students -- if a student is
5 referred to a third party for anxiety or
6 depression that is not at the level of
7 suicidal ideation, does that student need a
8 clearance letter to return to school?

9 A. Yes.

10 Q. Okay. So under what
11 circumstances is a clearance letter
12 required for a student to return to school?

13 A. Any time there is an
14 indication of a student having depressive
15 thoughts, being anxious, and then the
16 escalated levels like suicide ideation, but
17 it doesn't have to be suicide ideation. I
18 know that's, like, the extreme end, but
19 there is a beginning -- a beginner level as
20 well. So it could be a range of reasons.

21 Q. Are --

22 A. It's not really cut and dry,
23 I apologize.

24 Q. I didn't mean to interrupt,
25 to cut you off. Are all students who are

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1 referred out for mental health services
2 required to have a clearance letter to
3 return to school?

4 A. It depends on the individual
5 student's situation.

6 Q. So there may be situations
7 when a student is referred out for
8 services -- for mental health services, but
9 a clearance letter is not required?

10 A. Yes.

11 Q. What -- can you give me an
12 example of when that would be the case?

13 A. I mean, I don't want to use
14 the word, "depressed," because that would
15 be a crisis situation -- that may be a
16 crisis situation. It's really hard to give
17 you an example, because I would need an
18 individual -- it fluctuates from the
19 individual student, but if there was a
20 student who, I don't know, was having a bad
21 day in school for some reason, the HSSC may
22 say, okay, I need you to maybe go home and
23 kind of reset. So that's not, like, a
24 crisis situation and you wouldn't need to
25 see -- you wouldn't need to go to the

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1 hospital for a clearance letter. But if it
2 was a little bit more extreme, depending on
3 the conversation that you had with the
4 HSSC, then that determination would be
5 made.

6 Q. Who pays for the mental
7 health services that are provided to IPS
8 students by these third-party providers?

9 MR. INNES: Objection.
10 Outside the scope. Andrew, what
11 topic are you on for that one?

12 MR. KARP: I'm trying to
13 understand topic nine -- the
14 question number nine on the PFS.
15 Your scope objection is noted.

16 THE WITNESS: I don't know who
17 pays.

18 BY MR. KARP:

19 Q. Does IPS attribute any of the
20 referrals that are listed in the response
21 to question number nine of this PFS to
22 social media?

23 MR. INNES: Objection to form.
24 Asked and answered.

25 THE WITNESS: I don't know.

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1 All I see is a number.

2 MR. INNES: Andrew, I'll just
3 state for the record that that
4 question in particular and several
5 of your questions are not within
6 the scope that was negotiated or
7 even the text of the questions. To
8 the extent that you want answers on
9 that or you want a witness prepared
10 on some of these topics, we could
11 have had that discussion before, in
12 fact, we did have that discussion
13 before through colleagues --

14 BY MR. KARP:

15 Q. Let's turn back to Exhibit 2,
16 which is the Third Amended Plaintiff Fact
17 Sheet. Let's go to page 5. Page 5
18 includes enrollment data.

19 Do you see that?

20 A. I do.

21 Q. And just looking at the
22 2023-2024 school year, the district-wide
23 enrollment was 7,808 students. Do you see
24 that?

25 A. I do.

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1 MR. INNES: Objection to
2 scope.

3 THE WITNESS: I do.

4 BY MR. KARP:

5 Q. And if we look at Exhibit 3
6 for the 2023-2024 school year, we see that
7 30 students were referred for mental health
8 services.

9 Do you see that?

10 MR. INNES: Objection, scope.
11 Asked and answered.

12 THE WITNESS: I see it.

13 BY MR. KARP:

14 Q. Only 30 of 7,808 students for
15 the 2023-2024 school year were referred out
16 for services, mental health services; is
17 that correct?

18 A. That's what's on the
19 document.

20 Q. And these documents were
21 certified by Dr. Vauss, correct?

22 A. Yes.

23 MR. INNES: Objection. Asked
24 and answered.

25

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1 BY MR. KARP:

2 Q. Has the district studied any
3 trends in the referrals it has been making
4 for students to -- for IPS students to
5 receive mental health services from
6 third-party providers?

7 A. That's not how the district
8 retains its records, no.

9 Q. What do you mean by that?

10 A. I have not, I, meaning the
11 district, has not collected that data.

12 Can you tell me what number
13 we're on?

14 Q. What topic we're on?

15 A. Yes, what topic are we on?

16 Q. Do you have the notice in
17 front of you?

18 A. I do.

19 Q. I'll pull it up. Topic 34
20 is, "The identification and conclusions of
21 any analysis of any change over time in
22 students' mental, emotional, social, or
23 behavioral health."

24 A. Okay. Yup.

25 Q. And I was asking if the --

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1 now that you understand the topic we're
2 looking at, I was asking if the district
3 has ever conducted an analysis of any
4 trends or changes in the referrals for --
5 it has made for IPS students to receive
6 mental health services?

7 A. No, we have not.

8 Q. Does the district have an
9 understanding of why these students were
10 referred for mental health services?

11 A. Are you referring to students
12 listed in number nine?

13 Q. As to the students who were
14 identified in the response to question
15 number nine, does the district have an
16 understanding of why these students were
17 referred for mental health services?

18 A. I do not, because I don't
19 know who these students are.

20 Q. Is it the district's position
21 that all of these individuals who are
22 listed here have social media-related
23 issues?

24 A. The district can't say that,
25 I don't -- I don't have any information.

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1 I'm looking at numbers. I'm not looking
2 at -- looking at individual cases.

3 MR. INNES: Andrew, to the
4 extent that -- I don't know --

5 MR. KARP: I'm moving on,
6 Michael.

7 MR. INNES: Well, just maybe
8 we can have it, because I think
9 you're going to keep doing this.
10 Maybe I can have a running scope
11 objection. The topics that you've
12 read, right, the topics that you've
13 noticed don't mention social media,
14 right? Your questions are all
15 focusing on social media. So
16 that's a basis for at least one of
17 my scope objections.

18 BY MR. KARP:

19 Q. Ms. Pettiford, fair to say
20 that the COVID-19 pandemic had a
21 significant impact on the mental health of
22 Irvington Public School students?

23 A. Yes.

24 Q. And as a result of COVID-19,
25 the district started providing additional

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1 mental health services to students?

2 A. Yes.

3 Q. As a result of COVID-19, IPS
4 students felt isolated; is that fair?

5 A. It's not just COVID-19, I
6 mean, do we only want to talk about
7 COVID-19, because I can go --

8 Q. My questions are specifically
9 about COVID-19.

10 A. I could assume that to be
11 true.

12 Q. Students who were sent home
13 and could no longer see their friends at
14 school might have felt isolated; is that
15 fair?

16 A. That's possible, yes.

17 Q. IPS students who might have
18 felt scared during the pandemic of getting
19 sick or of loved ones getting sick; is that
20 fair?

21 A. Yes.

22 Q. IPS students missed out on
23 key milestones during the pandemic like
24 prom and graduation?

25 MR. INNES: Objection to form.

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1 Lack of foundation.

2 THE WITNESS: Maybe prom, but
3 not graduation.

4 BY MR. KARP:

5 Q. Was graduation able to take
6 place in person as it normally would occur?

7 A. I believe it did in 2021, I
8 believe it did.

9 Q. Were IPS students able to
10 attend to homecoming in person?

11 A. What year are you referring
12 to?

13 Q. This would be the 2020-2021
14 school year.

15 A. I'm not -- I don't deal
16 specifically with homecoming, so I can't
17 answer that question.

18 Q. Does the district try to
19 create an environment where students are
20 comfortable talking about their mental
21 health issues?

22 A. Yes.

23 Q. And does the district
24 endeavor to create an environment where
25 students feel comfortable seeking help and

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1 support for their mental health issues?

2 A. Yes.

3 Q. Does the district know how
4 many students, IPS students, were referred
5 for mental health services during the
6 2024-2025 school year?

7 A. 2024, I would have to look at
8 my -- I would have to research that. I'm
9 not sure.

10 Q. According to the response to
11 question nine, the number of students who
12 were referred for mental health services in
13 2022-2023 was 40 and the number of students
14 who received -- who were referred for
15 mental health services in 2023-2024 was 30.

16 Do you see that?

17 A. I do.

18 Q. Does the district have an
19 understanding of the -- of the decrease or
20 the decline in that number?

21 A. There could be a number of
22 reasons. It could be programming that's
23 done in the building that we talked about
24 earlier that comes with those awareness
25 dates. We've really ramped up our program

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1 into our -- to the student population, so I
2 would attribute it to that.

3 Q. Is it the district's
4 understanding or is it the district's
5 position that students are using social
6 media more and more year after year?

7 A. Yes.

8 Q. Let's look at the notice.

9 A. Can you repeat that?

10 Q. Go back to the notice,
11 Exhibit No. 1.

12 A. Oh, is that this?

13 MR. INNES: Yes.

14 THE WITNESS: Okay.

15 BY MR. KARP:

16 Q. As we went over a minute ago,
17 topic 32 is, "The number of students who
18 sought and/or received treatment or
19 consultation for mental, emotional, social,
20 or behavioral health concerns each year
21 during the Relevant Time Period."

22 Do you see that?

23 A. Yes.

24 Q. What is that number for the
25 2017-2018 school year?

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1 MR. INNES: Objection to form.

2 THE WITNESS: Are you
3 referring back to the chart you
4 just showed me, number nine?

5 BY MR. KARP:

6 Q. If you believe that the chart
7 represents that information, then sure.

8 A. I don't have an exact number.
9 The district doesn't have an exact number.

10 Q. Okay. Does it --

11 A. I would have to pull every
12 student's record to verify the number of
13 students that fit this criteria.

14 Q. Okay. So this topic is
15 asking for the number of students who
16 sought or received these services.

17 Do you see that?

18 A. Yes.

19 Q. Okay. And sitting here
20 today, you cannot give an exact number, you
21 would need to pull the records of every IPS
22 student. Was that your testimony?

23 A. Yes.

24 Q. Can you give me an
25 approximate number?

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1 A. No, I will not.

2 Q. Does IPS know this number for
3 any year between the 2017-2018 school year
4 through the present?

5 A. Are you, again, referring
6 back to number nine, the number for number
7 nine?

8 Q. I'm referring to the number
9 that's described in topic 32.

10 A. Since there aren't any
11 central locations to where this information
12 is collected, it would be difficult for me
13 to give you an exact number, unless I look
14 through the files of every student in every
15 school.

16 Q. And as of now, the district
17 has not done that?

18 A. The district has not done
19 that.

20 Q. Topic 34 has, we went over a
21 few minutes ago refers to, "The
22 identification and conclusions of any
23 analysis of any change over time in
24 Students' mental, emotional, social, or
25 behavioral health."

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1 Do you see that?

2 A. I do.

3 Q. Has IPS identified any trends
4 in student's mental, emotional, social, or
5 behavioral health from 2017 through the
6 present?

7 MR. INNES: Objection to form.
8 Outside the scope.

9 THE WITNESS: Not to my
10 knowledge. I don't have the data
11 but I have examples. We have a --
12 go ahead, I'll address your next
13 question.

14 BY MR. KARP:

15 Q. Thank you. Your testimony
16 though, just to make sure I'm
17 understanding, is that the district has not
18 identified any trends?

19 A. Yes, that's my testimony.

20 Q. And I believe you testified
21 earlier that the district has not performed
22 an analysis to understand what trends there
23 could be?

24 A. We have not performed an
25 analysis, but I have examples, if you would

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1 like to hear them.

2 Q. And your counsel will have an
3 opportunity to ask you questions when I'm
4 done.

5 A. Okay.

6 Q. What are HSSC monthly
7 reports?

8 MR. INNES: Objection to form.

9 THE WITNESS: It's a
10 reflection of monthly tasks that
11 HSSCs have completed.

12 BY MR. KARP:

13 Q. Did you say monthly tasks?

14 A. Yeah.

15 Q. What types of tasks?

16 A. Students that may have seen,
17 workshops that they may have held. I
18 believe parent conferences may be on it. I
19 would need to see the document to tell you
20 exactly.

21 Q. I'm handing you tab 15 which
22 we'll mark as Exhibit 4. This is an email
23 from Maria-Elena Vasquez to you.

24 Do you see that?

25 A. Yes.

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- - - - -
(Email dated 3/6/23 Bates
BW__Irvington00032766 marked
Pettiford Exhibit 4 for
identification.)
- - - - -
BY MR. KARP:
Q. And this email is dated
March 6, 2023?
A. Yeah.
Q. The email reads, "Good
morning, please see attached monthly report
and communication log." And then there's a
link and it says, "Thank You."
Do you see that?
A. Yes.
Q. The attachment to this email
is Vasquez HSSC monthly report
February 2023.
Do you see that?
A. Yes.
Q. I'm going to hand you the
attachment to that email. This is tab 15A.
We'll mark this as Exhibit 5.
- - - - -

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1 (IPS HSSC Monthly Report
2 dated 2/2023 Bates
3 BW__Irvington00032767 to 32769
4 marked Pettiford Exhibit 5 for
5 identification.)

6 - - - - -

7 BY MR. KARP:

8 Q. This is an -- excuse me, an
9 HSSC monthly report dated February 2023 and
10 the HSSC indicated is Maria-Elena Vasquez.

11 Do you see that?

12 A. Yes.

13 Q. Does this report reflect the
14 work that Ms. Vasquez performed herself or
15 would this include information or activity
16 that her team also conducted or performed?

17 A. Both.

18 Q. So just to make sure I'm
19 understanding, this report would include
20 some of the work that Ms. Vasquez did and
21 also some of the work that her team would
22 have done?

23 A. Ms. Vasquez doesn't have a
24 team, but when I look at professional
25 development, that would include other

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1 people outside of her.

2 Q. And where is professional
3 development?

4 A. It is on one, two -- the
5 third page. Referrals would also be just
6 that, referrals from people outside of her
7 to her.

8 Q. Okay. So these are other
9 individuals reporting to Ms. Vasquez?

10 A. Reporting information about
11 students, yes. Not reporting as if they
12 are part of her team.

13 Q. I see. They are providing
14 her with information --

15 A. Yes.

16 Q. -- that she can include in
17 this report?

18 A. Yes.

19 Q. Who would those individuals
20 be who are reporting information to
21 Ms. Vasquez?

22 A. This particular month, it
23 looks like an athletic director, an
24 assistant principal, it looks like a dean
25 of students, a secretary, and a coach.

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1 Q. Is the district relying on
2 these monthly reports to understand whether
3 students are seeking help for issues
4 allegedly related to social media?

5 MR. INNES: Objection to form.
6 You referred to these monthly
7 reports, I think we only have one
8 monthly report.

9 BY MR. KARP:

10 Q. I'll withdraw the question.
11 Ms. Pettiford, I'm showing you one HSSC
12 report, correct?

13 A. Yes.

14 Q. Other HSSC reports exist,
15 correct?

16 A. Yes.

17 Q. They are created on a monthly
18 basis?

19 A. Yes.

20 Q. Who creates them?

21 A. Individual HSSCs.

22 Q. Okay. How many HSSCs did the
23 district employ in 2023?

24 A. I would need to --

25 MR. INNES: Objection.

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1 Outside the scope.

2 THE WITNESS: I would need to
3 count.

4 BY MR. KARP:

5 Q. You may count, if you would
6 like.

7 A. Okay. What year did you ask
8 me?

9 Q. 2023.

10 MR. INNES: And just so my
11 objection is clear, it's outside
12 the scope. To the extent, Ms.
13 Pettiford, you know that in your
14 personal capacity, please answer
15 that.

16 THE WITNESS: Can you repeat
17 that?

18 MR. INNES: Sure. If you
19 know, if you can answer in your
20 capacity as Ms. Pettiford in the
21 district as opposed to the
22 district.

23 THE WITNESS: Okay. I'm
24 missing someone. I don't know the
25 employment dates offhand, so I

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1 can't -- I actually can't be
2 specific about this, because I know
3 we have new HSSCs. Currently, we
4 have nine.

5 BY MR. KARP:

6 Q. And has the district employed
7 approximately nine HSSCs over the past
8 decade?

9 MR. INNES: Objection.

10 Outside the scope. You can answer.

11 THE WITNESS: No. Answer?

12 MR. INNES: Yes.

13 THE WITNESS: No.

14 BY MR. KARP:

15 Q. How has that number changed
16 over time?

17 A. It has increased.

18 Q. And do you know the
19 approximate number of HSSCs who were
20 employed for the 2017-2018 school year?

21 MR. INNES: Outside the scope.

22 MR. KARP: And an approximate
23 number is fine.

24 THE WITNESS: 2017, four.

25 Approximately four.

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1 BY MR. KARP:

2 Q. And it is part of the -- as
3 part of their job responsibilities, HSSCs
4 create these monthly reports?

5 A. Yes.

6 Q. And is the district relying
7 on these HSSC reports for its claims that
8 social media has had a negative impact on
9 student mental health?

10 MR. INNES: Objection to
11 scope. You don't have to answer
12 that question.

13 BY MR. KARP:

14 Q. Are you going to follow your
15 counsel's instruction not to answer?

16 A. Yes.

17 MR. INNES: Andrew, I think
18 there's a way you can ask that
19 question that's not objectionable.

20 BY MR. KARP:

21 Q. Does the district expect that
22 HSSC reports, monthly reports, include
23 information relating or reflecting mental
24 health issues that were allegedly caused by
25 social media?

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1 MR. INNES: Objection to
2 scope.

3 THE WITNESS: To be clear, are
4 you asking if that information
5 would be in the report?

6 BY MR. KARP:

7 Q. Yes.

8 A. The report is not that
9 specific. HSSCs are aware of that
10 information, but they put -- it's numbers.

11 Q. So these reports would not
12 include or specifically refer to social
13 media as a potential cause of student
14 mental health issues; is that your
15 testimony?

16 A. The number would not be on
17 the report.

18 Q. Is it the district's position
19 that the numbers reflected here include
20 students whose mental health issues were
21 allegedly caused by social media?

22 A. It is very possible.

23 Q. How would the district know
24 whether the -- any of the cases or
25 individual incidents that are described in

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1 these HSSC reports relate to social media?

2 A. We have biweekly meetings. I
3 have biweekly meetings with my team, so
4 those are the discussions that we have
5 during our meetings. That is included in
6 the discussions we have in our meetings.

7 Q. Okay. And do -- when these
8 biweekly meetings occur, is -- are minutes
9 taken down or is there any written record
10 of those meetings?

11 A. There typically are agendas,
12 yes.

13 Q. Have any of those agendas
14 listed social media as a -- as a topic or
15 as an agenda item for those biweekly
16 meetings?

17 MR. INNES: Objection to form.
18 I'm just not clear what period of
19 time. I've lost the thread on
20 that.

21 THE WITNESS: What was the
22 last part?

23 BY MR. KARP:

24 Q. I can be clearer as to time.
25 For how long have you been having these

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1 biweekly meetings or has the district been
2 having these biweekly meetings.

3 A. That is, to my understanding,
4 it's always been a requirement of the
5 district.

6 Q. Going back to when?

7 A. I can speak to going back to
8 2020. So I would say 2020.

9 Q. Is it that you don't know
10 whether they occurred before 2020 or --

11 A. I know that they occurred, I
12 don't know the time frame. I don't know if
13 it was once a month or twice a month, but
14 they've always occurred.

15 Q. There were periodic meetings?

16 A. It is a requirement of the
17 district to have team meetings, yes.

18 Q. And before 2020, it might
19 have been less frequent, is that your
20 understanding?

21 A. I do not know.

22 Q. You do not know?

23 A. I don't want to guess.

24 Q. As of 2020, your
25 understanding is that these meetings

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1 occurred biweekly?

2 A. Yes.

3 Q. And for the period of time
4 that these meetings were occurring
5 biweekly, starting in or about 2020, did
6 any of the agendas list social media as a
7 topic or agenda item?

8 A. Yes.

9 Q. Okay. Which ones?

10 A. I would have to go back in
11 the record.

12 Q. Can you approximate how many?

13 A. I'd prefer not to. I don't
14 want to tell a lie.

15 Q. And I don't want you to lie
16 either. So if you don't know, then it's
17 fine to say that you don't know.

18 A. I don't know.

19 Q. You don't know, and just to
20 make sure we're on the same page, you don't
21 know the approximate number of times an
22 agenda for one of these biweekly meetings
23 listed social media as an agenda?

24 A. I do not know. I did not
25 prepare for that question.

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1 Q. I understand. Thank you.
2 Does the district compile HSSC monthly
3 reports in a central location?

4 A. Yes.

5 Q. Where is that?

6 A. On --

7 MR. INNES: Again, objection,
8 time period.

9 THE WITNESS: On my
10 secretary's computer.

11 BY MR. KARP:

12 Q. Who is your secretary?

13 A. Betty DuPont.

14 Q. And how far back do -- how
15 far back in time would those HSSC monthly
16 reports go?

17 A. The ones that Ms. DuPont will
18 have, I believe to 2022.

19 Q. Do you know or does the
20 district have a central repository of HSSC
21 reports from before 2022?

22 A. Not to my knowledge.

23 Q. Who would have HSSC reports
24 from 2022 and earlier?

25 A. I would assume the person

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1 who -- who supervised the department before
2 me or the people who supervised the
3 department.

4 Q. I'm handing you tab 19B. We
5 will mark this as Exhibit 6. This is an
6 HSSC report dated February 2023 from
7 Shanell Toomer.

8 Do you see that?

9 A. Yes.

10 - - - - -

11 (IPS HSSC Monthly Report
12 dated 2/2023 Bates
13 BW__Irvington00008609 to 8612
14 marked Pettiford Exhibit 6 for
15 identification.)

16 - - - - -

17 BY MR. KARP:

18 Q. Who is Ms. Toomer?

19 A. She's a health and social
20 service coordinator.

21 Q. And what school is she had?

22 A. She is at Thurgood Marshall.

23 Q. As indicated at the top of
24 the document, correct?

25 A. Yes.

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1 Q. And on the first page, if you
2 look down toward the bottom, there's a list
3 of group topics.

4 Do you see that?

5 A. Yes.

6 Q. And social media usage is one
7 of those topics?

8 A. Yes.

9 Q. A date is listed for social
10 media usage, it's February 13, 2023?

11 A. Yes.

12 Q. Do you know what this group
13 session involved?

14 MR. INNES: Objection.

15 Outside the scope.

16 THE WITNESS: I don't -- I
17 don't know.

18 BY MR. KARP:

19 Q. Okay. That's -- did you
20 speak to Ms. Toomer in preparation for
21 today's deposition?

22 A. No.

23 Q. If an HSSC were to conduct a
24 group session on social media, would it be
25 reflected like this in an HSSC monthly

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1 report?

2 MR. INNES: Outside the scope.

3 THE WITNESS: Yes, that's
4 fine.

5 BY MR. KARP:

6 Q. Has the district performed
7 any analyses on the information that is
8 contained in HSSC monthly reports?

9 A. An analysis, no. We have
10 discussions about what's contained in the
11 report.

12 Q. To the extent that the
13 individuals meeting to discuss these HSSC
14 monthly reports have discussed social media
15 and its potential effect on student mental
16 health, what has been discussed?

17 MR. INNES: Objection to
18 scope.

19 THE WITNESS: There are a
20 number of things that have been
21 discussed, how social media usage
22 is up. It has increased over the
23 years. How the comments on social
24 media, the likes, the shares have
25 affected -- negatively impacted our

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1 student population.

2 Social media has been at the
3 core of fights and aggressive
4 behavior of our students. It's
5 also been the reason why we have
6 been really diligent and
7 persistent with workshops for our
8 students in order to increase the
9 climate and culture of our
10 building to eliminate those acts
11 of aggression.

12 BY MR. KARP:

13 Q. So as a group meeting to
14 discuss these HSSC monthly reports, you
15 have discussed likes and shares?

16 A. Uh-huh.

17 Q. And the effect that those
18 have on student --

19 A. Yeah.

20 Q. -- mental health?

21 A. Yup.

22 Q. Meaning when someone sees a
23 post and likes it or has some reaction to
24 it and then they indicate that on whatever
25 platform they're using?

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1 A. Yes.

2 Q. And sharing meaning they
3 take, a user would take content that has
4 been posted and share it or make it
5 available to other people?

6 A. Yes.

7 Q. You said social media usage
8 is up?

9 A. Yes.

10 Q. And what is the district's
11 basis for that understanding?

12 A. There's no analysis that has
13 been done, however, the conversations with
14 the team, it's clear that social media
15 usage is up.

16 Q. And what makes it clear that
17 social media usage is up?

18 A. We discuss instances that
19 involve social media. Our children
20 constantly having their phone in their hand
21 being on social media. So I know you want
22 the analysis that I can't give you, but I
23 can give you information from meetings,
24 discussions, real life examples. That's
25 what I have to give.

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1 Q. You said students --

2 A. The district has to give.

3 Q. You said that students have
4 their phones in their hands --

5 A. Yes.

6 Q. -- using social media?

7 A. They would prefer to be on
8 their phone than be in class.

9 Q. Okay. And how does the
10 district know that students are -- strike
11 that.

12 Does the district have any
13 data regarding how often students are on
14 their phones using social media versus some
15 other activity like video games or watching
16 a TV show on some streaming service?

17 A. The district does not.

18 Q. You said social media is at
19 the core of fights?

20 A. Yes.

21 Q. Okay. What do you mean by
22 that?

23 A. A lot of times, when you have
24 conversations with students who have been
25 in an altercation, it usually comes back to

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1 something that they've seen on social
2 media. Someone posted something about
3 them. Someone commented on the post and
4 now there's some aggressive behavior toward
5 the person who originally posted or maybe
6 the person who wrote the comment, so a lot
7 of times that is the basis for why there's
8 student conflict.

9 Q. Someone has posted something
10 that is offensive or hateful and that
11 upsets another student; is that your
12 testimony?

13 A. The posts can upset another
14 student. The comments of viewers can upset
15 another student. The fact that the post
16 may have been shared with other students
17 upsets the student. So all of that.

18 Q. You mentioned climate and
19 culture?

20 A. Uh-huh.

21 Q. Does the district have a way
22 of evaluating climate and culture?

23 MR. INNES: Objection.

24 Outside the scope.

25 THE WITNESS: Did you say --

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1 did you use the word, "evaluating"?

2 MR. KARP: Uh-huh.

3 THE WITNESS: Not evaluating,
4 but we understand that it is
5 important to have a positive
6 climate and culture throughout the
7 building, which is why we employ
8 deans of climate and culture.

9 BY MR. KARP:

10 Q. And you said Dean Freeman was
11 in that role before she became assistant
12 principal or acting principal?

13 A. She was, so there is someone
14 else there now.

15 Q. Let's shift gears a little
16 bit.

17 Does IPS train school
18 counselors and HSSCs on HIB issues?

19 A. Yes.

20 Q. What kind of training is
21 offered to IPS staff on HIB issues?

22 A. So the training happens with
23 our anti-bullying specialists. So specific
24 school counselors are identified as
25 anti-bullying specialists. They receive

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1 compliance training, state compliance
2 training, it's actually mandatory, as well
3 as reporting, training on reporting
4 instances of HIB. That's what's required
5 from the state.

6 Q. HIB would include
7 cyberbullying?

8 A. Yes, harassment,
9 intimidation, and bullying. That is part
10 of it, yes.

11 Q. That bullying could also
12 happen in person?

13 A. Yes.

14 Q. Yes?

15 A. Uh-huh.

16 Q. It could also happen on other
17 social media such as text?

18 A. Yes.

19 Q. Someone could post -- someone
20 could bully someone else by posting to a
21 website?

22 A. Yes.

23 Q. Bullying existed way before
24 social media, you would agree?

25 A. I would -- I would agree, but

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1 social media has not helped. It has
2 intensified it.

3 Q. Why is it important for the
4 district to train staff on HIB-related
5 issues?

6 A. It's important because we
7 have to learn how to keep our students
8 safe, right? And then when instances do
9 come up, we need to know how to properly
10 investigate them so that we could put
11 procedures in place to keep our students
12 safe.

13 Q. Is HIB training for staff,
14 for IPS staff, mandated by the state of New
15 Jersey?

16 A. Yes.

17 Q. So all schools, all districts
18 within the state of New Jersey must train
19 their staff in HIB?

20 A. Yes.

21 Q. Fair to say, regardless of
22 whether students were using social media,
23 IPS staff would need to be trained in HIB,
24 correct?

25 A. Yes.

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1 Q. When a potential bullying
2 incident arises, who at IPS investigates
3 and determines whether that incident
4 qualifies as bullying within New Jersey
5 state law?

6 A. The anti-bullying specialist.

7 Q. And do those anti-bullying
8 specialists have district-wide
9 responsibilities or are they assigned to
10 particular schools?

11 A. Assigned to particular
12 schools.

13 Q. Okay. How many anti-bullying
14 specialists -- well, strike that.

15 Can you give me an
16 approximate number of the anti-bullying
17 specialists who are employed by IPS this
18 school year, so 2024 or 2025?

19 MR. INNES: Objection to form.
20 Outside the scope. I'm kind of
21 giving you a leeway here, because I
22 want you -- I understand that your
23 questions do have some overlap, but
24 most of these questions in the last
25 five to six minutes focus on

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1 bullying, right, which is your
2 topic 37, which we've discussed was
3 noticed for, originally noticed for
4 today, but is now noticed for
5 Friday. If you want to continue
6 these questions, I'm sure Ms.
7 Pettiford -- I can discuss that
8 with Ms. Pettiford, if she's
9 comfortable answering these
10 questions and then we can take 37
11 off the table for Friday.

12 MR. KARP: My understanding is
13 that it would fall -- that these
14 bullying programs would fall into
15 topic 38, district-wide or
16 school-wide programs and/or
17 initiatives proposed or taken by
18 the school district during --

19 MR. INNES: Okay. Fair. I
20 was just trying to shorten my
21 Friday.

22 BY MR. KARP:

23 Q. The question I asked, which
24 I'll reask now, is, and I can ask about a
25 different school year. Does the district

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1 have an approximate number or know the
2 approximate number of anti-bullying
3 specialists who were employed for the
4 2023-2024 school year?

5 A. So there's an anti-bullying
6 specialist in each elementary school.
7 There's one in both middle schools. And
8 then in the high school, there's a number
9 of anti-bullying specialists. Currently,
10 there's one for every grade level, because
11 of the large number of enrollment.

12 In 2023, they may have been
13 doubling up. They may have done, like,
14 nine and ten and 11 and 12, so there may
15 have been two.

16 Q. Understood.

17 A. Yeah.

18 Q. Have the employment numbers
19 for anti-bullying specialists changed
20 significantly between the 2017-2018 school
21 year and the present?

22 A. It has.

23 Q. And what trend has there
24 been?

25 A. The large -- the increase in

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1 the number of complaints, particularly in
2 the high school, so now there is an
3 anti-bullying specialist for each grade
4 level.

5 Q. I'm handing you tab 20.

6 A. Okay. I may need a break in
7 a minute or two.

8 MR. INNES: Do you want to
9 take a break?

10 THE WITNESS: I don't want
11 to --

12 MR. KARP: We can take a
13 break.

14 THE WITNESS: We can.

15 MR. KARP: We can take a
16 break.

17 THE VIDEOGRAPHER: The time
18 right now is 11:17 a.m. We are off
19 the record.

20 - - - - -

21 (A recess was taken at this time.)

22 - - - - -

23 THE VIDEOGRAPHER: The time
24 right now is 11:30 a.m. We are
25 back on the record.

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1 BY MR. KARP:

2 Q. Welcome back, doctor -- Ms.
3 Pettiford.

4 A. Thank you.

5 Q. I handed you tab 20 before
6 the break, but we actually don't even need
7 to look at it. You can put that to the
8 side.

9 THE EXHIBIT TECH: Are we
10 unmarking?

11 MR. KARP: I never marked it.

12 THE WITNESS: I don't need it.
13 Okay.

14 MR. INNES: You don't need it.

15 MR. KARP: I didn't say you
16 could keep. We'll take that back.

17 MR. INNES: I think I have a
18 copy.

19 BY MR. KARP:

20 Q. Fair to say that the state of
21 New Jersey has a criteria that it uses to
22 define HIB?

23 A. Yes.

24 Q. And there can be student
25 conflict that doesn't qualify as HIB,

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1 correct?

2 A. Yes.

3 Q. If it doesn't meet one of
4 those criteria?

5 A. Yes.

6 Q. Criteria, excuse me. For
7 bullying that occurs that does not qualify
8 as HIB --

9 A. Yes.

10 Q. -- does the district track
11 that information anywhere?

12 A. The information is on the HIB
13 claim, because there's a written claim that
14 includes, like, all the supporting
15 documents, so the result of the
16 investigation is also notated on a claim.

17 Q. Who completes these HIB claim
18 forms?

19 A. The individual anti-bullying
20 specialist.

21 Q. When an anti-bullying
22 specialist becomes aware of an incident, he
23 or she would fill out one of those claims?

24 A. No, I apologize, I thought
25 you meant who housed them. The victim is

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1 the person who gives the information,
2 initial information.

3 Q. And provides that to the
4 anti-bullying specialist?

5 A. Yes.

6 Q. And then the anti-bullying
7 specialist holds onto and maintains a
8 record of the claim?

9 A. It becomes a part of the
10 package, yes.

11 Q. But not every claim turns out
12 to be HIB?

13 A. Every claim is not
14 substantiated, no.

15 Q. Where -- or strike that.

16 Does IPS compile the HIB
17 claim forms in a central location?

18 MR. INNES: Objection.

19 Outside the scope.

20 THE WITNESS: Yes.

21 BY MR. KARP:

22 Q. Where does it keep these HIB
23 claim forms?

24 MR. INNES: Objection to
25 scope.

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1 THE WITNESS: A folder, a
2 Google Drive folder.

3 BY MR. KARP:

4 Q. Do you know what that folder
5 is called?

6 A. It's probably HIB claims and
7 then the year.

8 Q. So the number of HIB claims
9 would be larger than the number of --

10 A. Substantiated cases, yes.

11 Q. Thank you for finishing my
12 question.

13 A. I probably shouldn't have
14 done that, but ...

15 Q. No, we're trying to get out
16 of here --

17 MR. INNES: Trying to
18 get here.

19 MR. KARP: -- more quickly, so
20 that's helpful. Thank you.

21 THE WITNESS: So the answer
22 is, yes, because everything is not
23 substantiated.

24 BY MR. KARP:

25 Q. Thank you. Does IPS offer

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1 programs to assist the victims of bullying?

2 A. Yes.

3 Q. What types of programs?

4 A. It depends on the individual
5 case, of course, but individual counseling.
6 It could be group counseling. Services are
7 also offered to the offender as well,
8 because you want to eliminate the behavior.
9 It could be outside referrals, depending on
10 the severity. So each case is -- has to be
11 evaluated individually.

12 Q. Okay. So the victims and
13 also the perpetrators of bullying are
14 offered various services?

15 A. Yes.

16 Q. Some are offered by IPS
17 staff?

18 A. Yes.

19 Q. And some are offered by third
20 parties?

21 A. Yes.

22 Q. Are documents -- strike that.
23 For individual or group
24 counseling sessions, who leads those?

25 A. It depends on the individual

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1 student; however, a victim or offender may
2 be -- may have to see their school
3 counselor once a month. They might have to
4 see the HSSC twice a week. It just depends
5 on, again, the severity and the particular
6 incident.

7 Q. And are records maintained
8 for those individual or group counseling
9 sessions?

10 A. It should be -- it should be
11 documented in our communication logs.

12 Q. To your knowledge or to the
13 district's knowledge, how -- strike that.

14 For how long would those
15 records have been kept in the communication
16 logs?

17 A. How long -- can you restate
18 your question? I'm not clear.

19 Q. At what point in time did the
20 district start maintaining records of the
21 individual and group counseling sessions in
22 the communication logs?

23 A. For clarity, are you asking
24 when communication logs started within the
25 district?

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1 Q. We can start there. When did
2 the communication logs start within the
3 district?

4 A. To my knowledge, they have
5 always been in the district. There's
6 always been a form of documenting
7 interaction with students. The name just
8 changes. So it can go from a sign-in sheet
9 to now a communication log. So they've
10 always -- they should have always existed
11 in some capacity.

12 Q. Do communication logs include
13 records and information separate and apart
14 from these individual or group counseling
15 sessions to address bullying?

16 A. I don't understand your
17 question.

18 Q. Am I understanding your
19 testimony correctly that the records
20 created for individual counseling and group
21 counseling sessions would be saved in the
22 district's communication logs?

23 MR. INNES: Objection to form.

24 THE WITNESS: If a school
25 counselor or HSSC had an individual

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1 counseling session or held a group
2 session, it should be identified on
3 a communication log and probably
4 their monthly report.

5 BY MR. KARP:

6 Q. And my question is are
7 other -- is other activity tracked in a
8 communication logs?

9 A. Yes.

10 Q. Okay. What other activity is
11 tracked?

12 A. It could be a parent
13 conference, academic counseling, student
14 conflict, a number of things.

15 Q. You said that one way that
16 victims and perpetrators of bullying may
17 receive support is through a third-party
18 referral?

19 A. Yes.

20 Q. Is there documentation of
21 such referrals?

22 A. That should be on the
23 findings -- the findings question on the
24 HIB form or next steps. I don't know the
25 exact terminology of the session. It might

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1 simply be summary.

2 Q. And when you say, "the HIB
3 form," you're referring to the HIB claim?

4 A. Yes.

5 Q. When a student is referred
6 out for to receive services relating to a
7 bullying incident --

8 A. Okay.

9 Q. -- does that student need a
10 clearance letter upon returning to school?

11 A. Probably not.

12 Q. Does the district receive any
13 updates from the third parties who are
14 providing support to IPS students for
15 bullying?

16 A. Reports on what in
17 particular?

18 Q. If a student is receiving
19 services from one of these third parties,
20 let's say they have a few meetings, does
21 the district receive a report or an update
22 about how those meetings are going?

23 A. No, because that information
24 is confidential.

25 Q. Could the district ask for

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1 that information if it wanted to?

2 MR. INNES: Objection. Asked
3 and answered.

4 THE WITNESS: There would have
5 to be a release form by the parent
6 or guardian.

7 BY MR. KARP:

8 Q. Those records are kept by the
9 third-party providers?

10 A. Yes. In terms of session and
11 progress, yes.

12 Q. Does the district have any
13 specific policies for how it addresses
14 bullying incidents?

15 A. Yes, our policy follows the
16 state -- the state law. There's not a lot
17 of fluctuation when it comes to HIB.

18 Q. And is that policy set out in
19 the Student Code of Conduct?

20 A. Yes.

21 Q. Anywhere else?

22 A. The video, the training
23 videos on our district website who are for
24 everyone. And individual schools may post
25 it in different areas or discuss it and go

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1 over it with their student population.

2 Q. Do the HIB training videos
3 refer to social media at all?

4 A. Cyberbullying is included.

5 Q. Is social media or is any
6 specific social media platform identified?

7 A. It may be identified in
8 our -- when we do scenarios.

9 Q. Sitting here today, does the
10 district know one way or another whether
11 specific social media platforms are
12 identified in their HIB training videos?

13 A. I would have to look at my
14 video again.

15 Q. You mentioned that
16 cyberbullying would be inclusive or could
17 be inclusive of social media?

18 A. Yes.

19 Q. Sitting here today, do you
20 know if any of the HIB training videos
21 explicitly refer to social media?

22 A. A particular platform?

23 Q. Just social media in general.
24 Do the word -- I can strike that.

25 Do the words, "social

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1 media," come up in any of these HIB
2 training videos?

3 A. Yes.

4 Q. For the HIB training videos,
5 approximately how much time in those videos
6 is spent discussing social media?

7 MR. INNES: Objection to form.

8 THE WITNESS: That's a
9 difficult question. I don't know,
10 there's three or four slides, three
11 or four minutes. I would have to
12 look at the presentation.

13 BY MR. KARP:

14 Q. How long are the videos in
15 general in total?

16 A. I believe my video was -- the
17 district video was maybe ten minutes. I
18 would have to look. I don't want to lie.
19 I'm under oath.

20 Q. Thank you. The HIB training
21 videos are ten minutes?

22 A. Possibly, yes.

23 Q. Let's shift gears a bit to
24 talk about the COVID-19 pandemic and some
25 of the initiatives that the district

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1 enlisted during that time.

2 Fair to say that the
3 COVID-19 pandemic was a very challenging
4 time for all schools around the country?

5 A. Fair.

6 Q. IPS is not an exception to
7 that?

8 A. No.

9 Q. Did IPS hire an individual
10 named Karla -- Dr. Karla Rivera to help
11 address -- to help provide services to
12 students relating to the COVID-19 pandemic?

13 A. I don't know if that's why
14 she was hired, but she was hired as a
15 psychologist. I believe she's a
16 psychologist. Yup, school psychologist.

17 Q. I'm handing you tab 16, which
18 we will mark as Exhibit 7. This is an
19 email dated June 3, 2020, from Karla Rivera
20 to Dr. April Vauss, the superintendent of
21 IPS.

22 Do you see that?

23 A. Yes.

24 - - - - -

25 (Email dated 6/3/20 Bates

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1 BW__Irvington00188208 marked
2 Pettiford Exhibit 7 for
3 identification.)

4 - - - - -

5 BY MR. KARP:

6 Q. There's an attachment here,
7 it says, "COVID doc."

8 Do you see that?

9 A. Yes.

10 Q. I'm handing you tab 16A, it's
11 Exhibit 8. The title of this document is,
12 "COVID 19 Crisis Response Program."

13 Do you see that?

14 A. Yes.

15 - - - - -

16 (COVID 19 Crisis Response
17 Program Bates

18 BW__Irvington00188209 to 188212
19 marked Pettiford Exhibit 8 for
20 identification.)

21 - - - - -

22 BY MR. KARP:

23 Q. And under the title is Karla
24 Adams Rivera, and then it indicates her
25 doctorate degree.

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1 Do you see that?

2 A. Yes.

3 Q. Dr. Rivera proposed a crisis
4 response program to Dr. Vauss.

5 Do you see that?

6 A. I see the title. I haven't
7 read this document. If you're going to ask
8 me questions about it, I would prefer to
9 read it.

10 Q. Okay. And I'll represent to
11 you that I'm only going to focus on the
12 first page, but, you know, take your
13 time --

14 A. So I'll at least read.

15 MR. INNES: Read however much
16 you need to read to be familiar
17 with it.

18 THE WITNESS: Okay.

19 MR. INNES: If it's the first
20 page or the full document, that's
21 entirely up to you.

22 THE WITNESS: Okay.

23 BY MR. KARP:

24 Q. And, Ms. Pettiford, I will
25 represent to you that I'm specifically

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1 focused on the program rationale for my
2 questions --

3 A. Okay.

4 Q. -- which, I believe, ends
5 toward the bottom of the second page.

6 A. Okay. I'm comfortable.

7 Q. Let's focus on the first
8 paragraph, Dr. Rivera wrote, "We are facing
9 unprecedented times as our country faces a
10 global pandemic that will likely have
11 immeasurable consequences in the form of
12 death, illness, financial loss, and
13 psychological trauma."

14 Do you see that?

15 A. Yes.

16 Q. Does the district agree with
17 that statement?

18 A. Yes.

19 Q. Dr. Rivera goes on to say,
20 "While the entire nation is contending with
21 the disease, it is clear that urban
22 communities of color have been
23 disproportionately and severely impacted."

24 Do you see that?

25 A. No.

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1 Q. That is the second -- or the
2 last line in the first paragraph.

3 A. Oh, yes, yeah.

4 Q. Okay. Does the district
5 agree with that statement?

6 A. Yes.

7 Q. Does that statement apply to
8 IPS?

9 A. Yes.

10 Q. Dr. Rivera goes on to say
11 that, "Longstanding systemic inequalities
12 have led to a lack of access to healthcare,
13 and vulnerability to underlying health
14 conditions that increase severity of
15 COVID-19. In addition, a dearth of
16 resources and lack of jobs creates an
17 inability to stock up on food and supplies.
18 Living in more densely populated
19 communities, and a higher likelihood of
20 front line jobs have resulted in greater
21 exposure, illness and deaths among Black
22 and Latino communities."

23 Do you see that?

24 A. Yeah.

25 Q. Dr. Rivera wrote this to --

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1 wrote this proposal and provided it to
2 Dr. Vauss?

3 A. Okay.

4 Q. And you saw that in the email
5 that this was attached to, right?

6 A. Yes, I'm assuming this is the
7 attachment, yes.

8 Q. Does the district agree that
9 these are particular vulnerabilities and
10 characteristics of the Irvington community
11 that made it more vulnerable to the effects
12 of COVID-19?

13 A. Yes.

14 Q. In the next paragraph,
15 Dr. Rivera goes on to say that, "These
16 factors means that while the country is
17 experiencing a collective trauma, the
18 psychological wounds may be even deeper and
19 longer lasting among low income, urban
20 communities."

21 Do you see that?

22 A. Uh-huh.

23 Q. Does the district believe
24 that that applies to Irvington Public
25 Schools?

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1 A. Yes.

2 Q. And, "As educational
3 institutions reopen, they must do so well
4 prepared for the psychological burden
5 students, families and staff may bring with
6 them."

7 Do you see that?

8 A. Yes.

9 Q. And does the district agree
10 with that?

11 A. Yes.

12 Q. After Dr. Rivera submitted
13 this proposal, she was hired by the
14 district, right?

15 A. I wouldn't know that
16 information. I don't know the timeline in
17 which she was hired.

18 Q. You said earlier that she was
19 ultimately hired by the district, you just
20 don't know the timing?

21 A. Right.

22 Q. And what was Dr. Rivera's
23 role in providing services to students
24 during the COVID-19 pandemic?

25 A. I didn't work personally with

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1 Dr. Rivera.

2 Q. Topic 46 of this notice
3 refers to initiatives proposed or taken by
4 the district during the relevant time
5 period to address any impacts on students
6 from the COVID-19 pandemic.

7 Do you see that?

8 A. Yes.

9 Q. You're aware that Dr. Rivera
10 was hired to provide mental health support
11 services that -- and address mental health
12 issues relating to the COVID-19 pandemic?

13 MR. INNES: Objection.

14 Misstates prior testimony.

15 MR. KARP: You can answer.

16 THE WITNESS: I was -- I'm
17 aware that she was hired as a
18 school psychologist. Her specific
19 role and responsibilities, I don't
20 know.

21 BY MR. KARP:

22 Q. That's not something you
23 looked into to prepare for today's
24 deposition?

25 A. No.

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1 Q. I'm handing you tab 17 --

2 A. Yup.

3 Q. -- which we will mark as
4 Exhibit 9. This is a "Protocol for Dr.
5 Karla Rivera/Nadirah Muhammad's
6 Consultation."

7 Do you see that?

8 A. Yes, I see the title.

9 - - - - -

10 (Protocol for Dr. Karla
11 Rivera/Nadirah Muhammad's
12 Consultation Bates
13 BW__Irvington00124731 to 124733
14 marked Pettiford Exhibit 9 for
15 identification.)

16 - - - - -

17 MR. INNES: Okay. One second.
18 I need to object to the entry of
19 this exhibit. I mean, as I'm
20 sitting here now, this appears to
21 be a consultation for a particular
22 individual, that name -- while I'm
23 fine with the production of this
24 document, that name should have
25 been redacted as subject to a

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1 personal -- protected educational
2 information.

3 MR. KARP: Are you -- do you
4 mean Nadirah Muhammad is a student?

5 MR. INNES: That's what I'm --
6 if we can go off the record.

7 MR. KARP: She's a CarePlus
8 counselor.

9 MR. INNES: Okay. Got it.
10 All right. Okay. Sorry.

11 BY MR. KARP:

12 Q. No problem. So this document
13 states, "Dr. Karla Rivera, Irvington's
14 Floating School Psychologist, and Nadirah
15 Mohammed, CarePlus counselor, have been
16 hired to provide trauma-informed school
17 strategies in response to COVID-19 to all
18 Irvington schools."

19 Do you see that?

20 A. Yes.

21 Q. Does that refresh your memory
22 as to the reason that Dr. Rivera was hired?

23 A. No.

24 Q. Oh.

25 A. I mean, it tells me, but I

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1 was not involved in her hiring --

2 Q. I understand.

3 A. -- for the district.

4 Q. It says here, as part of this
5 protocol that Dr. Rivera and Nadirah
6 Muhammad were hired to provide
7 trauma-informed school strategies in
8 response to COVID-19.

9 Do you see that?

10 A. Yes.

11 Q. Any reason to doubt that?

12 A. No.

13 Q. "This includes offering
14 information on the physical and emotional
15 well-being of staff, assisting in creating
16 trauma-informed learning environments, and
17 identifying, assessing, and addressing
18 traumatic stress in the school setting."

19 Do you see that?

20 A. Yes.

21 Q. Does the district have any
22 reason to doubt that these individuals were
23 hired for these purposes?

24 A. No.

25 Q. Let's look at the bottom of

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1 this page to where it says, "School
2 personnel who would like to refer a student
3 to Dr. Rivera must first."

4 A. Uh-huh.

5 Q. And then it provides a list
6 of steps that need to be taken.

7 Do you see that?

8 A. Yes.

9 Q. And the third item here on
10 this list is that, "The issue with the
11 student is identified as COVID-19 related."

12 Do you see that?

13 A. Yes.

14 Q. So in order for a student to
15 be receiving services from Dr. Rivera or
16 from Nadirah Muhammad at CarePlus, the
17 issue identified by the student would need
18 to be COVID-19 related; is that right?

19 A. According to that statement,
20 yes.

21 Q. Does the district have any
22 reason to doubt that this is true?

23 A. No.

24 Q. Do you know anything -- what
25 does the district know about Dr. Rivera's

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1 background?

2 A. I don't know anything
3 about -- I, meaning the district, doesn't
4 know anything about Dr. Rivera's
5 background.

6 Q. Does the district know
7 whether Dr. Rivera has any special
8 expertise in the area of social media?

9 MR. INNES: Objection to form.

10 THE WITNESS: I cannot -- I'm
11 a little confused at the line of
12 questioning.

13 BY MR. KARP:

14 Q. Sure. I can rephrase.

15 A. It sounds -- the questions
16 sound like a human resources question, I'm
17 not involved in, as I sit in the district
18 seat, in human resources. So I don't know
19 why people were hired, what the scope of
20 their job entails. I don't know that
21 information.

22 Q. And --

23 A. And from the -- from the
24 letterhead, Dr. Rivera was -- worked with
25 special services. That's a whole 'nother

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1 department.

2 Q. Let's talk about that. So
3 what is the special services department?

4 A. So special services
5 department deal with our special education
6 population.

7 Q. Is it the district's position
8 that Dr. Rivera was only serving the
9 special education population at Irvington
10 Public Schools?

11 A. When you talk about CarePlus,
12 the answer would be yes.

13 Q. So Nadirah Muhammad at
14 CarePlus only provided services to special
15 education students at IPS?

16 A. CarePlus deals with our
17 special education population. I don't know
18 who Nadirah Muhammad is specifically.

19 Q. Okay. So CarePlus as a
20 provider in general --

21 A. Yes.

22 Q. -- in the way that it has
23 been engaged by Irvington Public Schools --

24 A. Yes.

25 Q. -- works specifically with

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1 the special needs population?

2 A. Yes.

3 Q. As to Dr. Rivera, is it the
4 district's position that she provided
5 COVID-19 related services to all students
6 or just the special education students?

7 A. From the document you gave
8 me, my assumption would be special
9 services.

10 Q. Putting aside just the
11 document that I provided to you, and in
12 your preparation for topic 46, does the
13 district know whether Dr. Rivera provided
14 COVID-19 related services to students who
15 are not qualified or designated special
16 needs or special education?

17 A. I'm unaware. I can't
18 accurately answer that question.

19 Q. Okay. As part of this
20 document on the second page, there's a
21 request for consultation form?

22 A. Yes.

23 Q. And this particular form is
24 blank.

25 Do you see that?

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1 A. Yes.

2 Q. Do you know where -- do you
3 know if the district maintained -- or
4 strike that.

5 Do you know if the district
6 has maintained these consultation forms in
7 a central location?

8 A. I'm not aware.

9 Q. Are you aware of whether the
10 district has maintained these consultation
11 forms anywhere?

12 A. I'm unaware.

13 MR. INNES: I'm sorry, do you
14 want to go off the record? Do you
15 have a question?

16 THE WITNESS: No, I'm just
17 trying to rationalize it in my
18 head.

19 BY MR. KARP:

20 Q. So is it the district's
21 testimony that it doesn't know whether any
22 of these consultation forms to the extent
23 that they were completed are still within
24 the district's files?

25 MR. INNES: Objection to form.

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1 Asked and answered.

2 THE WITNESS: Asked and
3 answered.

4 BY MR. KARP:

5 Q. Does the district have, for
6 any of the years that these services were
7 being offered, does the district have in
8 its possession any of the completed
9 consultation forms?

10 MR. INNES: Objection.
11 Outside the scope.

12 THE WITNESS: In my position
13 with the district, with guidance
14 and health and social services, I
15 am not familiar with this form.

16 BY MR. KARP:

17 Q. What programs or initiatives
18 has Irvington Public Schools implemented to
19 respond to the needs of students who are
20 economically disadvantaged?

21 A. We partner with Essex
22 Regional Educational Corporation. We
23 provide students with different items that
24 they need for day-to-day living, clothing,
25 hygiene items. We take them on college

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1 tours. We are we have a big college fair
2 for them in particular. We also do
3 parenting workshops. We do resource
4 fair -- we don't do a resource fair, we
5 give out a list of resources to parents and
6 families to help them in their situation.

7 Q. Let's talk about some of
8 these initiatives.

9 A. What number are you on? It
10 just helps my brain work, I'm sorry.

11 Q. I understand.

12 MR. INNES: I think it's 44.

13 THE WITNESS: Okay. Yeah.

14 BY MR. KARP:

15 Q. Forty-four, you guys are
16 faster. I've got a pile of documents over
17 here. Let's talk about the partnership
18 with Essex Regional Education corporation.

19 A. Uh-huh.

20 Q. How long has the district
21 been partnering with Essex?

22 A. To my understanding, they
23 always partnered with Essex Regional --

24 Q. When you say --

25 A. -- in terms of the relevant

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1 time period.

2 Q. So in terms of the relevant
3 time period, they've had this partnership?

4 A. Not the whole time, you know
5 what, I don't want to guess. So
6 representing the district where I sit,
7 since 2020, we have partnered.

8 Q. Okay. So at least since
9 2020?

10 A. Yes.

11 Q. Okay. Who at IPS is involved
12 in this partnership with Essex?

13 A. Ms. Pettiford.

14 Q. And that's you?

15 A. Yes.

16 Q. Do other individuals at IPS
17 work with Essex to provide these important
18 services to IPS students?

19 A. So the partnership begins
20 with myself and Essex Regional and then I
21 disseminate it to the liaisons throughout
22 the district.

23 Q. How much of your time, Ms.
24 Pettiford, is spent working with Essex
25 Regional and partnering with them to

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1 provide services to Irvington students?

2 A. Are you looking for days,
3 hours?

4 Q. A percentage.

5 A. A percentage. You like
6 percentages. Maybe 20 percent. You're
7 talking about Ms. Pettiford now, right?
8 Okay.

9 Q. To the extent that liaisons
10 are also assisting with distributing and
11 making these services available --

12 A. Yes.

13 Q. -- can the district
14 approximate how much of their time is spent
15 on this particular work with Essex?

16 A. Work with Essex Regional or
17 work with the families?

18 Q. Implementing the services and
19 distributing resources through -- through
20 the partnership with Essex.

21 A. It varies throughout the
22 year, because it depends on the needs of
23 the individual families, but if I had to
24 guess, I would say 15 to 18 percent.

25 Q. Okay. What programs or

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1 initiatives does IPS implement to support
2 students who are dealing with drug or
3 alcohol use?

4 A. We partner with the Imani
5 Center, so students who are having
6 drug-related issues or need drug testing,
7 they're referred to the Imani Center for
8 testing, for workshops that support the
9 problem that they're having.

10 We partner with the Covenant
11 House. That's a dual role, because they
12 help with drug -- they help with drug
13 support as well as homeless needs of our
14 students. What number is that?

15 Q. This is 40.

16 A. We used to partner with
17 Concentra, it is during the relevant time
18 period, but not current. Concentra offered
19 drug testing as well as drug awareness
20 presentations and workshops for our needs.
21 And Imani Center is the Bridge Center, so
22 they're the same, the same -- the Bridge
23 program is the umbrella that houses the
24 Imani Center, if that makes sense.

25 Q. For how long has the district

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1 partnered with the Bridge program?

2 A. I believe throughout the
3 relevant time period. I don't know for
4 certain. But they have partnered with the
5 Imani Center at least for 2020.

6 Q. What about the partnership
7 with Concentra, when did that start?

8 A. I would be guessing. They no
9 longer partner with Concentra in terms of
10 testing, but they still do offer, like,
11 workshops. It would be totally a guess
12 that I don't feel I'm comfortable giving.

13 Q. Do you know when the
14 partnership ended?

15 A. Twenty -- it's another guess.
16 Maybe 2021.

17 Q. And how about Covenant House?

18 A. Covenant House isn't listed.

19 Q. It's not listed here, but it
20 was one of the --

21 A. One of the --

22 Q. -- partnerships that you
23 mentioned.

24 A. Oh, yes, yes. What do you
25 want to know about the Covenant House? I'm

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1 sorry.

2 Q. That's okay. When did the
3 partnership start?

4 A. At a minimum from 2021.

5 Q. Who liaises and coordinates
6 with these partners to provide services
7 relating to drug and alcohol use?

8 A. Between myself and the HSSCs.

9 Q. Approximately how much time
10 do you and the HSSCs spend working with
11 these partners to provide services to IPS
12 students?

13 A. We have not done an analysis,
14 but if I look at their monthly reports, I
15 may be able to tell you that they do a lot
16 of work with -- in terms of our homeless
17 students are you referring to? Was that
18 your question?

19 Q. Are you including --

20 A. Repeat your question to make
21 sure I answer it correctly.

22 Q. Sure. Approximately what
23 percentage of time do you, Ms. Pettiford,
24 and the HSSCs spend working with these
25 partners to provide students with services

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1 relating to drug and alcohol use?

2 A. Oh, okay, that's different.
3 They would spend more time than I do in
4 terms of implementation of the programs. I
5 would spend the time making the connection,
6 even though they do as well, I don't
7 implement it with students, they do. So I
8 would say 25 percent.

9 Q. Twenty-five percent of your
10 time and 25 percent of the HSSCs' time?

11 A. Uh-huh, these are strictly
12 guesses, because I have not done an
13 analysis.

14 Q. What programs or initiatives
15 has IPS implemented to respond to the needs
16 of students who engage in violence?

17 A. The same programs that we've
18 discussed also support violence. The Imani
19 Center does. The Covenant House would.
20 There may be some programs that we may
21 find, like, online programs, but the
22 same -- the same programs have a lot of
23 support in place that we can utilize for
24 students.

25 Q. The 25 percent approximate

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1 that you just -- or estimation that you
2 just gave me would include services
3 relating to students who have engaged in
4 violence?

5 A. Yes, they can. They
6 absolutely can.

7 Q. It's not a separate number, a
8 separate additional amount of time?

9 A. No.

10 Q. What programs or initiatives
11 does the district offer to support its
12 homeless students?

13 A. That's the partnership we
14 discussed with Essex Regional. They put
15 together programs throughout the year that
16 will support our students in terms of
17 getting them -- their vital needs met,
18 whether it's winter coats, hygiene, hygiene
19 items. Like I said earlier, we take them
20 to a really big college day where they have
21 different vendors there with information
22 for them. So that partnership is with
23 Essex Regional.

24 Q. A minute ago, you mentioned
25 that there were certain liaisons who might

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1 be involved in supporting the work that's
2 done by Essex?

3 A. Yes.

4 Q. What roles do those
5 individuals have within IPS?

6 A. They're HSSCs.

7 Q. Okay. The 20 percent
8 approximation that you gave me earlier
9 about the work you do with Essex, did that
10 also apply to the HSSCs?

11 A. Yes.

12 Q. Has Irvington ever hired
13 consultants specifically to address drug
14 abuse among IPS students?

15 A. We have hired agencies to
16 come in and do workshops on vaping, yes.

17 Q. Do you recall the names of
18 those agencies?

19 A. Yes, New Life Mental Health
20 Counseling Services.

21 Q. Any others?

22 A. Not that I could recall at
23 this time.

24 Q. Has Irvington Public Schools
25 ever hired consultants to specifically

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1 address alcohol abuse among IPS students?

2 A. No, not to my knowledge.

3 Q. Has Irvington ever hired any
4 consultants specifically to address issues
5 relating to poverty among IPS students?

6 A. Hired, no, not to my
7 knowledge.

8 Q. Has Irvington Public Schools
9 ever hired a consultant to specifically
10 address issues relating to homelessness
11 among IPS students?

12 A. No.

13 Q. Has IPS ever hired any
14 consultants specifically to address family
15 conflict and domestic issues among IPS
16 students?

17 A. Hired outside agencies, no.

18 Q. That's something that staff
19 would address, IPS staff would address?

20 A. Yes.

21 Q. HSSCs would be among them?

22 A. Yup.

23 Q. What percentage of time would
24 you approximate HSSCs spend addressing
25 issues of family conflict and domestic

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1 violence for IPS students?

2 A. Strictly a guess, I'll say --
3 I'm going to stick with 15 to 20.

4 Q. Has IPS ever hired a
5 consultant specifically to address what it
6 believes to be -- well, strike that.

7 Has IPS ever hired a
8 consultant with -- to address issues of
9 social media usage among IPS students?

10 A. Not that I'm aware of.

11 Q. Earlier, we were talking
12 about the HIB training and how HIB claims
13 are made.

14 Do you recall that?

15 A. Yes.

16 Q. Approximately how much time
17 do HSSCs spend addressing HIB issues?

18 A. In terms of HIB claims?

19 Q. Yes.

20 A. Those are done by
21 anti-bullying specialists. That's not an
22 HSSC's role. Not that they don't have
23 involvement, but in terms of claim,
24 investigation, that's not their role.

25 Q. Is HIB 100 percent of the

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1 role for anti-bullying specialists?

2 A. Yes.

3 Q. Do HSSCs have any involvement
4 with addressing HIB issues?

5 A. Yes, it depends on the
6 individual circumstance.

7 Q. Can the district approximate
8 how much time HSSCs spend addressing
9 HIB-related issues?

10 A. It would be kind of hard to
11 do, because it's individual. So I can't
12 give you -- I don't think it's smart for me
13 to give you a number when it's not their
14 sole responsibility.

15 Q. So you're saying it's not
16 their sole responsibility?

17 A. No.

18 Q. It's part of their
19 responsibilities. It --

20 A. It's all part of your
21 responsibility, right, but if a claim is --
22 if a claim is made and they have
23 involvement, they will be involved, student
24 A. Student B, they may not be needed, so
25 it's really hard for me to give you a

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1 number.

2 MR. KARP: Understood. I
3 think I am done with my exam. I
4 want to open it up to others on the
5 Zoom in case they have questions
6 for the witness before I pass the
7 witness.

8 THE WITNESS: I didn't know
9 there was a Zoom.

10 MS. WEAINT: No further
11 questions from the Google/YouTube
12 Defendants.

13 MR. SALE: Nothing further
14 from TikTok either. Thank you.

15 MR. KARP: Michael?

16 MR. INNES: Yeah, let's take a
17 quick break to organize my
18 thoughts. I don't think I'm going
19 to have anything.

20 THE VIDEOGRAPHER: The time
21 right now is 12:19 p.m. We're off
22 the record.

23 - - - - -

24 (A recess was taken at this time.)

25 - - - - -

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1 THE VIDEOGRAPHER: The time
2 right now is 12:33 p.m. We're back
3 on the record.

4 BY MR. INNES:

5 Q. Good afternoon, Ms.
6 Pettiford. For the record, my name is
7 Michael Innes. We know each other.

8 A. Yeah.

9 Q. I represent the district.
10 Counsel for Snap and other Defendants had
11 an opportunity to ask you questions this
12 morning regarding various topics that you
13 were the designee for. It's now my turn to
14 ask you a few questions about that.

15 Before I do so, I just want
16 to make is a statement on the record that
17 there was questioning regarding the number
18 of psychologists or social workers, et
19 cetera, with respect to the Plaintiff's
20 Fact Sheet. The answers that the district
21 provided to that, and this is question
22 number 16 to the fact sheet, were N/A.

23 Counsel, it's my
24 recollection that when this was served, we
25 received no response back from Defendants

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1 asking for clarification on this. It's our
2 position that it is not a well-phrased
3 question and that's why you have an N/A.

4 Clearly, the district has,
5 today has testified that it does employ
6 some, if not all, of the folks that you
7 listed as examples. To the extent you
8 would like to meet and confer off the
9 record about what was actually asked for in
10 16, we would be happy to consider that and
11 then file an amended fact sheet.

12 MR. KARP: May I make a
13 response --

14 MR. INNES: Absolutely.

15 MR. KARP: A statement in
16 response. This is Mr. Karp. I was
17 not aware of any discovery
18 correspondence regarding that
19 particular question in the fact
20 sheet. I'm happy to meet and
21 confer with you outside of this
22 deposition to the extent that it
23 may be appropriate for the fact
24 sheet to be amended and we can sort
25 that out off the record.

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1 MR. INNES: Certainly. Thank
2 you. Just to be clear, I don't
3 know if there was any
4 correspondence on this, other than
5 us serving the fact sheet, I don't
6 know if there was return
7 correspondence on this particular
8 topic. And I don't want to imply
9 that there was, I just don't know.
10 I don't recall receiving any.

11 Okay. So, Ms. Pettiford,
12 let's pick up where counsel for
13 Snap left off. It was toward the
14 end of his questioning, you'll
15 recall that there were questions
16 about percentage of time that
17 certain employees spent
18 addressing certain issues.

19 Do you remember that?

20 THE WITNESS: Yes.

21 BY MR. INNES:

22 Q. Okay. So I just want to
23 ask -- a little feedback here -- is poverty
24 in any way related to social media?

25 MR. KARP: Object to form.

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1 And an objection for one is an
2 objection for all, Counsel?

3 MR. INNES: Thank you, I
4 forgot about that.

5 Let me strike that, sorry,
6 Ms. Pettiford.

7 THE WITNESS: What's
8 happening?

9 BY MR. KARP:

10 Q. So Mr. Karp was just saying
11 that there's folks that are on the Zoom and
12 if I ask a question, lawyers like to object
13 to all questions, right, so Mr. Karp is
14 going to object on their behalf so we don't
15 get a cacophony --

16 A. Oh, okay.

17 Q. -- of defense objections.

18 A. I didn't know that until
19 right before the break.

20 Q. So let me rephrase -- let me
21 rephrase my question. How, if at all, does
22 social media -- strike that.

23 Is it the district's
24 position that social media and poverty are
25 related?

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1 MR. KARP: Object to form.

2 THE WITNESS: Yes.

3 BY MR. INNES:

4 Q. Is it the district's position
5 that the harms caused by social media and
6 the harms caused by alcohol are related?

7 A. Yes.

8 MR. KARP: Object to form.

9 BY MR. INNES:

10 Q. Is it the district's position
11 that the harms related to social media and
12 bullying are related?

13 A. Yes.

14 Q. Is it the district's position
15 that harms related to social media as well
16 as confirmed HIB events can be related?

17 MR. KARP: Object to form.

18 THE WITNESS: Yes.

19 BY MR. INNES:

20 Q. Is it the district's position
21 that social media and reported HIBs that
22 are not confirmed can also be related to
23 social media?

24 MR. KARP: Object to form.

25 THE WITNESS: Yes.

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1 BY MR. INNES:

2 Q. Would you agree with the
3 statement that -- that the district does
4 not consider its students to be a pie
5 chart, for example?

6 MR. KARP: Object to form.

7 THE WITNESS: No, I do agree.

8 BY MR. INNES:

9 Q. And you were asked -- and
10 moreover, does the district agree that, for
11 instance, a counselor's time spent on
12 issues, could the district break that out
13 into a pie chart?

14 MR. KARP: Object to form.

15 THE WITNESS: It's difficult
16 to do, no.

17 BY MR. INNES:

18 Q. And why is that difficult to
19 do?

20 A. Well, for number one, your
21 time to task varies from day to day, right?
22 To be able to give a definitive percentage
23 on a specific topic is just not feasible,
24 because one day, I may be inundated with a
25 student conflict. Another day, I may be

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1 able to do some academic advising. So it's
2 really difficult, which is what I stated
3 when Andrew, what's your last name?

4 MR. KARP: Karp.

5 THE WITNESS: Mr. Karp was
6 asking the question. It's hard to
7 give a percentage that would equal
8 100, it's just not logical.

9 BY MR. INNES:

10 Q. Okay. And remind me, Ms.
11 Pettiford, who do you oversee in the
12 district?

13 MR. KARP: You're asking her
14 in her personal capacity?

15 MR. INNES: Yes.

16 THE WITNESS: School
17 counselors and health and social
18 service coordinators.

19 BY MR. INNES:

20 Q. Okay. I want to focus on
21 health and social service coordinators.
22 Health and social service -- and this is --
23 I'm asking you on behalf of the district.

24 A. Okay.

25 Q. Health and social service

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1 coordinators, part of their job is to
2 address student mental health; is that
3 correct?

4 A. Yes.

5 Q. And when a particular HSSC is
6 addressing a particular student --

7 A. Uh-huh.

8 Q. -- that could be mental
9 health related to poverty, correct?

10 A. Yes.

11 Q. And it could be mental health
12 related to social media, correct?

13 A. Yes.

14 Q. And sometimes, it's related
15 to both; is that correct?

16 A. Yup.

17 Q. So a student's -- a
18 particular student's issue is not easily
19 divided between the different particular
20 harms; is that right?

21 A. No, it's not usually divided
22 or able to just say it's one particular
23 situation.

24 Q. Would you say -- is it the
25 district's position that social media has

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1 exacerbated these underlying -- these
2 underlying conditions that harm mental
3 health?

4 MR. KARP: Object to form.

5 THE WITNESS: I agree. I
6 would agree. The district would
7 agree. We all agree.

8 BY MR. INNES:

9 Q. Is it the district's
10 position -- would the district agree with
11 the position that social media is a
12 substantial factor in the mental health
13 harms for the scholars in the district?

14 MR. KARP: Object to form.

15 THE WITNESS: I would agree in
16 many ways it is. I don't know if
17 you want me to give you examples.

18 BY MR. INNES:

19 Q. Sure, certainly, how many
20 examples?

21 A. I mean, I have a few. So I
22 believe that let's start with the
23 challenges that lie on social media. The
24 challenges in itself are -- will affect the
25 mental health of students and sometimes the

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1 safety of students.

2 We talked about COVID a lot
3 and what the impact of COVID was. What we
4 didn't discuss was, during COVID, students
5 were doing -- they were allowed to do
6 things on, say, Google, for instance, to
7 create their own links, have their own chat
8 rooms, create disturbances throughout the
9 day, because if you think about children,
10 they would much rather be on a social media
11 platform talking with their friends as
12 opposed to being on a Zoom for algebra 2,
13 right?

14 So we like to say COVID is a
15 reason and no doubt that it contributed to
16 the mental health of students, but we
17 cannot ignore the impact that social media
18 has had, the exposure of racism, the
19 exposure of colorism, fight pages that are
20 created, comments that are constantly
21 driving students to want to check their
22 phone to see what the latest trend or
23 information is.

24 I think I mentioned fight
25 pages. Being able to post derogatory

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1 information, comment on derogatory
2 information and it disappears within a day,
3 right, all contribute to HIB claims, the
4 mental health of students, students not
5 wanting to come to school to avoid that
6 type of behavior. So we can't -- we can't
7 eliminate or ignore the impact that social
8 media has had on those things.

9 Q. You mentioned just now HIB
10 and Mr. Karp also asked you questions about
11 HIB investigations.

12 A. Uh-huh.

13 Q. When an HIB investigation is
14 undertaken, there's interviews of the
15 victim; is that right?

16 A. Victim, yes.

17 Q. And there's interviews of the
18 perpetrator --

19 A. The offender.

20 Q. The offender, so there's
21 interviews of both the victim and the
22 offender. Are there other interviews of
23 witnesses to the event?

24 A. Yes. So the victim is
25 interviewed. The victim is -- does a

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1 written statement. The offender does the
2 same. And then both are given an
3 opportunity to bring witnesses to support
4 whatever their story may be. That's part
5 of the investigation in ten days.

6 Q. And have -- has the district
7 investigated HIB incidents in the past that
8 involve social media?

9 A. Yes.

10 Q. And when students are
11 interviewed as part of that investigation,
12 is that during the school day?

13 A. Yes, it's during the school
14 day, yes.

15 Q. Are they on occasion removed
16 from class to participate in that
17 investigation?

18 A. They have to come out of
19 class. Everyone involved, victim,
20 offender, witnesses. Time is spent writing
21 statements, printing information from
22 social media, if it relates, reviewing the
23 documents, yes, students are definitely
24 pulled out of class.

25 Q. And those investigations into

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1 HIB incidents involving social media, would
2 the district agree that that could have a
3 potential negative effect on all students
4 involved in the investigation?

5 MR. KARP: Object to form.

6 THE WITNESS: Yes, because it
7 results in learning loss. So not
8 being in class when you're supposed
9 to be learning will ultimately
10 affect you. And if it's a severe
11 case where you may be put out of
12 school or suspended for a few days
13 because of the investigation, which
14 is also an option, it affects
15 learning loss.

16 BY MR. INNES:

17 Q. Okay. And just so the jury
18 is familiar, when you say, "learning loss,"
19 what exactly do you mean by that?

20 A. That being out of class. So
21 you learn -- you lose time, because New
22 Jersey goes by seat time, most departments
23 do, so there's a number of hours you should
24 be in your seat, right, to be proficient in
25 that particular area. When you are out of

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1 that seat, out of that seat for interviews,
2 out of that seat for in-school suspension,
3 out of that seat for out-of-school
4 suspension, you are losing valuable
5 academic time. So we consider that
6 learning loss.

7 MR. INNES: Thank you. No
8 further questions. Andrew?

9 MR. KARP: Could we take a
10 quick break? I think I'll need to
11 consult with Codefendants.

12 MR. INNES: Sure.

13 THE VIDEOGRAPHER: The time
14 right now is 12:45 p.m. We are off
15 the record.

16 - - - - -

17 (A recess was taken at this time.)

18 - - - - -

19 THE VIDEOGRAPHER: The time
20 right now is 12:52 p.m. We are
21 back on the record.

22 BY MR. KARP:

23 Q. Ms. Pettiford, welcome back.
24 I'm just going to follow up on a few of the
25 questions that your counsel discussed with

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1 you a few minutes ago.

2 A. Uh-huh.

3 Q. Do you recall providing some
4 testimony regarding the relationship
5 between social media on the one hand and
6 poverty, HIB, alcohol use, drug use, and
7 bullying more generally?

8 A. Yes.

9 Q. Okay. You said that social
10 media was related to poverty, HIB,
11 bullying, alcohol use, and drug use?

12 A. Yes.

13 Q. Okay. What analysis has the
14 district conducted to support that there is
15 a relationship between social media and
16 poverty, HIB, bullying, alcohol use, and
17 drug use?

18 A. As I stated previously, the
19 district has not done an analysis. That's
20 not how we collect the data. However,
21 through meetings with my team, district
22 meetings, district meetings with various
23 people within the district, it's clear that
24 there's a correlation between those things.

25 Q. So the district is relying on

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1 oral discussions and conversations that
2 people at the district have had?

3 A. We're relying on
4 conversations from people who are doing the
5 work, yes.

6 Q. Stories and anecdotes that
7 these individuals have raised at meetings?

8 A. It sounds like you're making
9 light by using the word, "stories."
10 Because, okay, I don't want you to make it
11 light because it's a serious situation,
12 right? So this is conversations based on
13 the work that the people who do the work
14 were having those conversations. That's
15 how we get to a goal, right, we sit, we
16 discuss, we come up with a plan and we
17 implement it.

18 Q. And the district, as you just
19 said, considers these to be serious issues
20 and serious problems?

21 A. Yes.

22 Q. But the district has not
23 taken the next step of performing any type
24 of analysis to understand the relationship
25 or anything like that?

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1 A. We have not --

2 MR. INNES: Objection to form.
3 Argumentative.

4 THE WITNESS: We have not
5 performed an analysis.

6 BY MR. KARP:

7 Q. Can the district point to any
8 studies supporting the contention that
9 there is a relationship between social
10 media on the one hand and poverty, HIB,
11 bullying, drug use, and alcohol use?

12 MR. INNES: Objection to form.

13 THE WITNESS: So I cannot
14 point to a study. That was not one
15 of my areas of topics that I was to
16 discuss. If I had known that, I
17 would have pulled up a few studies.

18 BY MR. KARP:

19 Q. So the district is aware of
20 studies that support that?

21 A. There are -- there are
22 studies. I just don't have them, because
23 that's not one of the topics that I was
24 prepared for.

25 Q. Sitting here today, what can

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1 you recall about these studies, if
2 anything?

3 A. I'm not -- I don't want to
4 speculate.

5 Q. Do you recall that your
6 counsel asked you a number of questions
7 about HIB investigations?

8 A. Yes.

9 Q. You said that students were
10 pulled out of class to participate in these
11 investigations?

12 A. As needed, yes.

13 Q. And could these HIB
14 investigations be conducted after school?

15 A. No.

16 Q. Why not?

17 A. Contractually, school
18 counselors have a contract, they're
19 contracted from 8:00 to 3:00.

20 Q. So they have to happen
21 between the hours of 8:00 to 3:00?

22 A. Yes.

23 Q. Could they happen during
24 lunch periods?

25 A. They probably do, if students

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1 are available. Remember, it depends on the
2 availability of students.

3 Q. And if a student is
4 questioned or participates in one of these
5 interviews during a lunch period, they're
6 not missing class instruction, correct?

7 A. It depends on how long the
8 interview goes.

9 Q. You said earlier that social
10 media is related to poverty, and HIB,
11 bullying, alcohol use, and drug use, yes?

12 A. Yes.

13 Q. You said that it's not easy
14 to divide up the time that someone spends
15 on issues relating to social media versus
16 some of these other issues, correct?

17 A. Yes.

18 Q. Okay. Sitting here today,
19 does the district have a way to calculate
20 how much time an individual spends
21 addressing issues that they believe relate
22 to social media?

23 MR. INNES: Objection to form.

24 THE WITNESS: The district
25 does not have a way to calculate

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1 that information, because it varies
2 from day to day, month to month,
3 year to year.

4 MR. KARP: I do not have any
5 further questions. Does -- I do
6 have a brief statement I want to
7 make before we go off the record,
8 but I'm done with my questions, if
9 anyone on Zoom has anything.

10 MS. WEAINT: No further
11 questions from Google/YouTube.

12 MR. KARP: Are you done with
13 your questions?

14 MR. INNES: No.

15 MR. KARP: You're not. Should
16 I wait to make my statement
17 until --

18 MR. INNES: It's entirely up
19 to you.

20 MR. KARP: Okay. I'll just
21 say our position is that we would
22 like to keep this record open to
23 the extent any additional documents
24 are produced after this deposition.
25 I know that there are some

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1 discovery disputes that the parties
2 are working through. So to the
3 extent that anything is produced
4 after the fact that would be
5 relevant, we would certainly want
6 to reserve our rights to continue
7 asking questions.

8 We don't know if that's
9 going to be necessary at this
10 time and we certainly hope it's
11 not, but we are going to reserve
12 our rights to the extent
13 additional documents are
14 produced. And that's the only
15 statement I wanted to make.

16 MR. INNES: Okay. Yeah, so
17 just in response to that, the
18 parties and the court agreed that
19 we would have ten hours to conduct
20 the 30(b)(6) depositions. If
21 there's time left open at the end
22 of that and you want to continue to
23 bring back designees on prior
24 topics, we can have that
25 conversation at that point, I hope

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1 that's not necessary. But I think
2 that's enough of a response.

3 BY MR. INNES:

4 Q. Ms. Pettiford, I'm actually
5 not going to switch sides on this, because
6 we've just got -- it's very, very easy
7 questions.

8 A. Okay.

9 Q. So Mr. Karp just questioned
10 you about oral conversations that you had
11 with your staff?

12 A. Uh-huh.

13 Q. And your staff is a staff of
14 folks who have advanced degrees, correct?

15 MR. KARP: Object to form.

16 THE WITNESS: Yes.

17 MR. KARP: Are you asking her
18 in her individual capacity or as
19 the district?

20 BY MR. INNES:

21 Q. Sure. I can rephrase it as
22 the district. Do you recall Mr. Karp asked
23 the district questions about what -- that
24 it didn't have an analysis related to the
25 time spent with by various folks addressing

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1 mental health services issues.

2 Do you recall that?

3 MR. KARP: Object to form.

4 THE WITNESS: Yes.

5 BY MR. INNES:

6 Q. And do you recall your
7 testimony that the district bases its
8 conclusions on conversations that are had
9 amongst those folks in those roles?

10 A. Yes.

11 Q. And folks in those roles that
12 are meeting and having conversations about
13 the mental health of the student population
14 specifically as it relates to social media
15 and their use of social media, those
16 individuals have doctoral degrees?

17 MR. KARP: Object to form.

18 THE WITNESS: Some of them do.

19 BY MR. INNES:

20 Q. And some of them have
21 certificate degrees?

22 MR. KARP: Object to form.

23 THE WITNESS: They all have
24 certificates.

25

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1 BY MR. INNES:

2 Q. And what do they have
3 certificates in?

4 A. It just depends on their
5 role. It could be, some of them are
6 licensed practical counselors. Some of
7 them are master's of social work. Some of
8 them are certified as school counselors.
9 PhD in leadership, PhD in education, PhD in
10 mental health. I'll have to get the rest
11 from human resources.

12 Q. Thank you. That's fine.
13 Before we took our last -- our last break
14 or after we took our last break --

15 A. Okay.

16 Q. -- there was a comment that
17 was made that I think you wanted to
18 address.

19 A. Oh, the comment by Mr. Karp
20 when he said, way too many examples,
21 Shelley.

22 Q. Is that the one you wanted to
23 address? Go ahead.

24 MR. KARP: I object to form.
25 It was about missing a flight. It

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1 was a joke.

2 THE WITNESS: I didn't know
3 the context of the comment. It was
4 a little offensive, because I felt
5 like you were implying that the
6 examples may have not been relevant
7 and I take it offense to that,
8 because, to me, this is a serious
9 topic that affects our students and
10 I feel like -- I know this is
11 your -- you guys job to defend
12 these platforms, but they
13 absolutely have a negative effect
14 on our students' mental health. So
15 when you said that, I was, like, I
16 didn't know you were referring to
17 your colleague, but I was
18 absolutely offended by -- by the
19 comment.

20 MR. KARP: Michael, may I make
21 a statement in response?

22 MR. INNES: Absolutely.

23 MR. KARP: And, Ms. Pettiford,
24 certainly, I take these issues very
25 seriously. I did not know that you

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1 had misinterpreted or that you
2 would interpret it that way and I
3 thought that you had heard the
4 earlier conversation about my
5 colleague trying to make a flight
6 and I was simply joking as we were
7 joking amongst ourselves about how
8 much time was left in the
9 deposition --

10 THE WITNESS: Okay.

11 MR. KARP: -- and being able
12 to to get to the airport in time.

13 THE WITNESS: Understood.

14 MR. KARP: So that was all
15 that I intended and I certainly did
16 not mean to offend you. I
17 apologize.

18 THE WITNESS: Understood.
19 Thank you.

20 MR. INNES: Okay. No further
21 questions.

22 MR. KARP: Nothing further.

23 MR. INNES: Time on the
24 record.

25 THE WITNESS: So Mr. Karp has

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1 been on the record for two hours
2 and five minutes. Mr. Innes has
3 been on the record for 12 minutes.

4 The time right now is
5 1:03 p.m. We are off the record.

6 - - - - -

7 (Whereupon, the deposition
8 was concluded at 1:03 p.m.)

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C E R T I F I C A T I O N

I HEREBY CERTIFY that the proceedings and evidence are contained fully and accurately in the stenographic notes taken by me upon the foregoing matter on May 13, 2025, and that this is a correct transcript of same.

Robin L. Clark
Registered Professional Reporter

(The foregoing certification of this transcript does not apply to any reproduction of the same by any means unless under the direct control and/or supervision of the certifying reporter.)

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INSTRUCTIONS TO WITNESS

Please read your deposition over carefully and make any necessary corrections.

You should state the reason in the appropriate space on the errata sheet for any corrections that are made.

After doing so, please sign the errata sheet and date it.

You are signing same subject to the changes you have noted on the errata sheet, which will be attached to your deposition.

It is imperative that you return the original errata sheet to the deposing attorney within thirty (30) days of receipt of the deposition transcript by you. If you fail to do so, the deposition transcript may be deemed to be accurate and may be used in court.

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ACKNOWLEDGMENT OF DEPONENT

I, SHELLEY PETTIFORD, do hereby
certify that I have read the foregoing pages
and that the same is a correct
transcription of the answers given by me to
the questions therein propounded, except for
the corrections or changes in form or
substance, if any, noted in the attached
Errata Sheet.

DATE

SIGNATURE

Subscribed and sworn to before me this
day of ,
2025.

My commission expires:

Notary Public